



United States
Department of
Agriculture

Forest
Service

Southwestern
Region

September 1986



Public Comments and Forest Service Response to the DEIS, Proposed Gila National Forest Plan

Volume I



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Public Comments and Forest Service Response to the DEIS, Proposed Gila National Forest Plan - Volume I

INTRODUCTION

A draft Environmental Impact Statement and Proposed Plan were published in May, 1985. Changes were made to the Plan and planning documents as a result of public comments. The "Public Comment and Response Document, Gila National Forest DEIS, Proposed Gila National Forest Plan" contains a short summary of the public involvement process used during Forest Planning, a summary of the changes made as a result of the public comments to the draft Environmental Impact Statement and Proposed Plan (this section also includes the rationale for the recommendation on the two Wilderness Study Areas and the inventoried Wild and Scenic Rivers), public comments received on the draft planning documents, and the Forest Service response to these comments. The public comments and Forest Service responses are in two volumes.

PUBLIC INVOLVEMENT

During the development of the Plan, the Forest Service has actively and

SUMMARY

diligently encouraged, fostered, and facilitated public participation in the planning process. The public involvement process was designed to meet the following objectives

1. To broaden the information base upon which land and resource management planning decisions are made.
2. To ensure that the Forest Service understands the needs, concerns and values of the public.
3. To inform the public of Forest Service land and resource planning activities, and
4. To provide the public with an understanding of Forest Service programs and proposed actions.

The public involvement process began early in the forest planning process. The first step was to publish the Notice of Intent to prepare an Environmental Impact Statement in the Federal Register in 1980.

After this notice was filed, we began to gather information on Forest issues. The first step in generating issue information was to find out who was interested in forest planning. To do this, a card was mailed to all individuals on existing Forest mailing lists asking them if they wished to receive information regarding Forest planning. A news release requesting the names of interested individuals was also published in 16 newspapers in the Gila area of influence. These two types of contacts resulted in 2,374 requests to be put on the mailing list.

Next, a Public Involvement Workbook was developed. This workbook contained a short explanation of the planning steps and what an issue is, how we would evaluate public responses to issues, a list of the preliminary issues identified by Forest Service personnel, and a space to respond. This workbook was mailed to all individuals on the mailing list. Workshops to help people fill out these workbooks were held at seven locations. In addition to notifying the people on the mailing list of these workshops, the schedules were published in 14 newspapers and announced on 18 radio and television stations. The workshops were attended by approximately 155 people. Three hundred and sixty-nine responses to

the workbook were received. These responses were used to help develop the issues and concerns that drove the planning process. Issues and concerns were verified and updated as a result of comments received during the draft Environmental Impact Statement review period.

The mailing list generated as part of the issue development process was maintained for use in notifying interested individuals about the draft Environmental Impact Statement and Proposed Plan. Approximately two months before the draft planning documents were ready for mailing, cards were sent to the people on the mailing list to inform them that the planning documents would soon be available and to ask them which documents they wished to receive. Individuals no longer interested in the planning process were removed from the mailing list.

On May 31, 1985, the Environmental Protection Agency printed the notice of availability of the Gila National Forest Plan draft Environmental Impact Statement in the Federal Register.

On May 31, 1985, Forest personnel sent planning documents to all individuals and groups that requested copies of specific documents. A letter was also sent to those that received the documents explaining that if they or the groups with which they were associated wished to meet with Forest personnel about the document, to please call and a meeting would be arranged.

At the time the documents were mailed, news releases indicating the availability of the documents and the length of the public comment period were sent to 24 newspapers and radio stations. Those people requesting documents were also sent a copy of the letter mentioned above.

Later on in the draft Environmental Impact Statement comment period, a second news release was sent to the newspapers and radio stations. This news release informed the public that, due to several requests for an extension, the public response period had been extended 30 days (to October 8, 1985). This news release also stated that arrangements could be made with the Forest Service to hold individual or group meetings upon request. This offer was made so that meetings could be as convenient as possible for those individuals and groups that wanted to provide the Forest with additional information or who wanted additional information about the proposed Forest Plan or Environmental Impact Statement.

This public involvement process met our public involvement objectives. The meetings that were held by request were well attended (over 190 people total). Gila National Forest personnel obtained a good understanding of the needs and interests of our publics and gave those requesting the meetings the opportunity to increase their understanding of the Proposed Plan and draft Environmental Impact Statement. Information meetings were held with the Dona Ana County Associated Sportsmen in Las Cruces, the Sierra Club in El Paso, the Sierra Club in Las Cruces, the Forest Permittees in Luna and the Farm and Livestock Bureau in Quemado. In response to

a request by forest grazing permittees, a permittee meeting was held in Silver City to gather comments. (The transcript of this meeting is included at the end of the Public Comment Documents).

In addition to the meetings mentioned above, a meeting was held with environmental group representatives to review changes made to the original Proposed Action Alternative. Two meetings were held with the Forest grazing permittee representatives to review sections of the Environmental Impact Statement and the Management Emphasis portion of the Forest Plan, and meetings were held with timber industry representatives to discuss demand and the amount and location of the proposed timber sales in the Forest Plan.

Meetings, together with the written comments received on the planning documents, resulted in several changes to the Proposed Action Alternative. These changes are summarized below.

SUMMARY OF CHANGES Allowable Sale Quantity and Change In Effects of Timber Harvest

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 million board feet (MMBF) per year in the first decade. The volume was projected to increase to approximately 48 million board feet by the fifth decade. This would have resulted in entering approximately 98 percent of the tentatively suitable timber on the Forest by the end of the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data.

Over the last 10 to 15 years the Gila National Forest has sold an average of approximately 30MMBF of sawtimber per year. The present allowable sale quantity converted to board feet is 54.1MMBF. The volume sold has varied from a low of less than 1MMBF to a high of 62MMBF. The demand projection used in the draft Environment Impact Statement was based on the volume sold between 1970 and 1979. An increase in demand over time was projected. The Forest Management Team has reexamined this projection considering the timber sold in recent years and does not feel that projection of an increased demand over time is warranted. The average volume sold over 10 to 15 years includes both good and bad economic periods for the timber industry. Since a true price quantity demand projection could not be made, 30MMBF has been projected as the new demanded level. No basis has been found to support a projection above or below this level. This demand projection will be reviewed when the Plan is revised.

The timber benefit values originally used in the Plan were calculated from time trend analysis of Regional sales data (1968-1979). This process yielded a benefit value of \$171.59/MBF for Ponderosa pine and \$142.99/MBF for mixed conifer. These benefit values were projected to increase over time. The revised benefit values are based on average Forest selling prices from 1978 to 1982. This span of years includes three years when

prices were low and two years when prices were higher. The result is a revised benefit values of \$104.81/MBF for Ponderosa pine and \$86.35/MBF for mixed conifer. These benefit values include \$40.00 purchaser credit. They are projected to stay constant over time.

The changed benefit values were entered into FORPLAN and a revised Proposed Action Alternative was developed. The first step in this process was to run a new Maximum Present Net Value Benchmark. This Benchmark projected timber yields at approximately 25MMBF per year in the first decade. These yields increased over time to a level of approximately 30MMBF by the fourth decade. Approximately 67 percent of the tentatively suitable timber acres would be needed to sustain this level of output. This benchmark emphasized increasing wildlife diversity in the areas logged. Almost all of the Logical Timber Management Areas on the Forest were projected to be entered by the fifth decade. This would result in a significant portion of the less than 40 percent slope unroaded suitable timber acres being developed by the fifth decade.

The Maximum Present Net Value Benchmark did not address many of the issues on the Forest, thus it was modified to form the present Proposed Action Alternative. In the present Proposed Action Alternative the sawtimber volume was constrained to be equal to or greater than 30MMBF in the first decade (this is approximately 15 percent below the original Proposed Action Alternative). The cubic foot equivalent of this volume is to be sustained over time. Using the silvicultural prescriptions proposed in the Plan, this volume can be sustained on approximately 62 percent of the tentatively suitable timbered area. At this allowable sale quantity level enough volume would be made available to maintain the Reserve N.M. sawmill, a very important source of employment in the Preserve area. This level of harvest would not provide for expansion of the timber industry but would provide for a level of output approximately equal to that harvested over the past 10 to 15 years. In addition to the direct timber benefits, integrated stand management techniques would provide for increased wildlife habitat diversity in the harvested areas. Timber harvest on fewer acres than proposed in the original Plan should result in a 43 percent reduction in on site soil loss from timber activities.

Steep Slope Volume

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems was also a concern expressed by a number of people. In reevaluating the Proposed Action Alternative it was determined that the most cost efficient method of obtaining the 30MMBF target was to log some portion of the volume from steep slope areas. This is because steep slope areas on the Forest often have relatively high volumes per acre, and logging steep slope areas in conjunction with less than 40 percent slope areas often results in construction of fewer miles of roads per thousand board feet of volume harvested. In order to respond to the concerns regarding steep slope logging, the model was constrained to allocate the harvest of no more than 5MMBF from steep slope areas. This resulted in steep slope harvest in the modified

Proposed Action Alternative being 59 percent of that projected level in the original Proposed Action Alternative. The Forest Management Team feels that the use of cable systems should be pursued. In the long term, cable harvest could result in the construction of less miles of roads and less roading of presently unroaded area than obtaining 30AMBF from only less than 40 percent slope areas. The use of cable systems on steep slope areas could eventually result in their use on less than 40 percent slope areas. This could have positive environmental benefits.

Timber Road Construction

Along with the changes in allowable sale quantity, the projected road construction miles would change significantly. The original Proposed Action Alternative projected construction of approximately 1,450 miles of roads over 50 years. The modified Proposed Action Alternative projected construction of approximately 640 miles of roads. This is a 56 percent reduction in projected five decade road construction. There would be a reduction of approximately 20 percent in road construction and reconstruction in the first decade. Local roads constructed as a result of timber activities and not needed for administrative purposes would be closed. This would result in closing approximately 65 percent of the roads constructed. Construction and reconstruction of fewer roads and the closure of roads when no longer needed for administrative purposes should result in approximately 35 percent less soil loss from roads than that projected in the original Proposed Action Alternative.

Presently Undeveloped Portions of the Forest

Because of changes in the amount and location of timber harvest activities, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and be managed to maintain their semi-primitive recreation opportunities. The Forest presently has approximately 699,000 acres that are unroaded. Implementation of the original Proposed Action Alternative would have resulted in roading approximately 36,000 acres in the first decade and 214,000 acres by the fifth decade. This alternative would have resulted in roading most of the tentatively suitable timber in the presently unroaded areas by the fifth decade. The modified Proposed Action Alternative would result in roading approximately 21,000 acres in the first decade. If projected for five decades, it would result in development of only approximately 70,000 acres. This is a 42 percent reduction in the unroaded acres effected in the first decade and a 67 percent reduction in acres effected by the fifth decade. The modified Proposed Action Alternative would only result in developing three percent of the existing unroaded area in the first decade and ten percent if the implementation of the Plan is projected five decades. The following table shows the first decade effects on the unroaded areas:

UNDEVELOPED AREA	EXISTING ACRES	ACRES AFFECTED		APP.% OF AREA MODIFIED PA
		OLD PA	MODIFIED PA	
NOLAN	11,630	800	0	0%
MOTHER HUBBARD	6,090	6,090	0	0%
HELLS HOLE	18,860	0	0	0%
LOWER SAN FRANCISCO	25,560	0	0	0%
THE HUB	7,770	0	0	0%
BRUSHY SPRINGS	5,790	0	0	0%
APACHE MTN.	14,305	0	0	0%
FRISCO BOX	40,050	5,660	1,950	5%
BRUSHY MTN.	7,890	0	0	0%
ASPEN MOUNTAIN	19,510	1,907	1,907	9%
WAGON TONGUE	11,560	0	4,000	34%
EAGLE PEAK	27,180	7,105	7,105	23%
DEVELS CREEK	89,585	11,500	2,500	3%
GILA BOX	24,350	0	0	0%
ELK MTN	4,475	0	0	0%
T BAR	6,970	0	0	0%
CANYON CREEK	9,235	1,950	1,950	21%
ADJ. TO GILA WILDERNESS	73,515	2,650	1,050	1%
TAYLOR CREEK	6,130	0	0	0%
STONE CANYON	7,340	0	0	0%
WAHOO MTN.	22,080	0	0	0%
POVERTY CREEK	10,260	0	0	0%
DRY CREEK	29,560	0	0	0%
ADJ. TO ALDO L. WILDER	96,055	0	0	0%
LARGO	13,110	0	0	0%
SAWYERS PEAK	64,200	0	0	0%
MEADOW CREEK	34,140	280	140	0%
ADJ. TO BLUE RGN. WILDER.	10,795	0	0	0%

The pie charts on the following page depict the modified Proposed Action Alternative's effects on the unroaded portion of the Forest, and the future undeveloped area of the Forest compared to the developed portion.

Wilderness Study Areas

In the draft Environmental Impact Statement the two Wilderness Study Areas (The Lower San Francisco River and Hells Hole) were not recommended for wilderness classification. Because of the public comments on this recommendation, the decision was reevaluated between the draft and final Plan. The Forest Management Team continues to support the nonwilderness recommendation. The following is the rationale for this decision.

The Hells Hole Wilderness Study area was originally part of a larger RARE II area that extended into Arizona. The Arizona portion contained an ecosystem that was under-represented in the Wilderness System. As a result, the entire area was designated a Further Planning Area in the RARE II process. When the New Mexico Wilderness Bill (public law 96-550) was passed the area was designated a Wilderness Study Area. Since that time, the Arizona Wilderness Bill released the Arizona portion for other multiple uses. Since this was

CHART 1

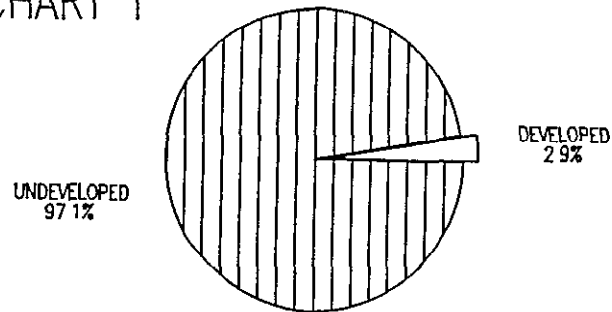


CHART 2

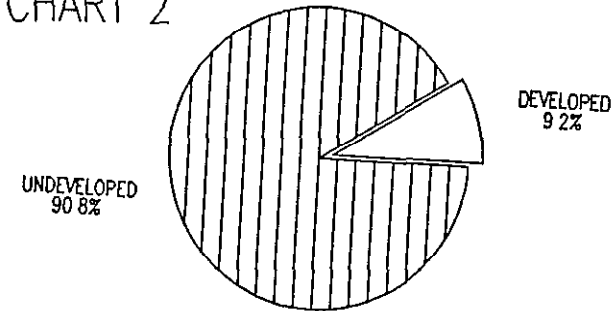


CHART 3

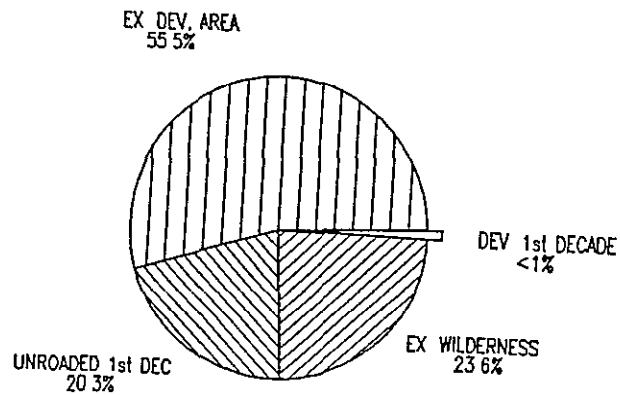


CHART 4

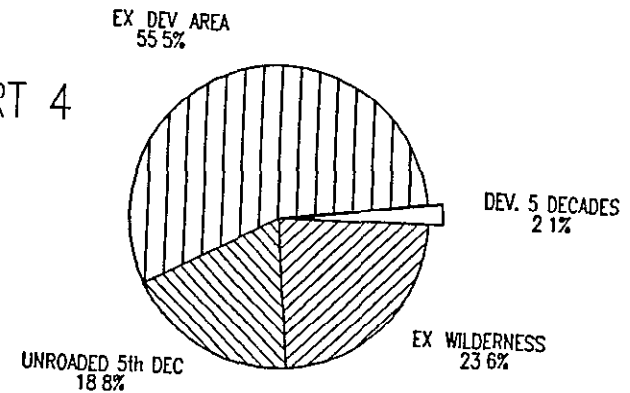


Chart 1 shows the portion of the existing 899,015 undeveloped acres that would be developed during the first decade. Chart 2 shows the portion of the existing undeveloped acres that would be developed if the Proposed Action Alternative were implemented for 50 years. Chart 3 shows the portion of the total Forest acreage (3.3 million acres) that is presently developed (EX. DEV. AREA), the portion that is Wilderness (EX. WILDERNESS), the additional portion that would be developed by the end of the first decade (DEV. 1st DECADE) and the portion that would remain undeveloped by the end of the first decade (UNROADED 1st DEC). Chart 4 is similar to Chart 3 only it shows the portions of the Forest that would be unroaded at the end of the fifth decade and the portion of the Forest that would be developed by the end of the fifth decade if the Proposed Action Alternative (the Plan) were implemented for 50 years. It should be noted, that the Plan will be revised in 10 to 15 years. At that time long term projections could change.

the portion that contained the under-represented ecosystem and since the existing wilderness on the Gila already contains many acres with vegetation similar to the New Mexico Hells Hole Wilderness Study Area, wilderness designation of the area would not contribute significant ecological diversity to the Wilderness System.

In addition to the area not contributing significant ecological diversity to the existing Wilderness System, the present and expected future recreational use of this type of area would be low. Similar types of areas in the existing Gila Wilderness, the Blue Range Wilderness, and the Aldo Leopold Wilderness receive very light use. The existing wilderness areas can provide for the expected increased use for wilderness recreation in this type of environment.

The Lower San Francisco River Wilderness Study Area was designated a Wilderness Study Area by the New Mexico Wilderness Bill. This area has been accessed by vehicles for recreational purposes for many years. Forest Service personnel have repeatedly reviewed the effects of this use and have not found unacceptable resource damage. In recent years vehicles have been used by 60 to 85 percent of the recreationists using the canyon. Vehicle use seems to have stabilized at a level considerably below the level of the late 1970's and 1980. Analysis of permits indicate that the majority of this use occurs near the confluence of Big Dry Creek and the San Francisco River. This is the only area on the Forest where this type of an environment can be accessed by vehicles. As a result, it provides a unique motorized recreation opportunity. This use of the canyon, along with the fact that the existing wildernesses on the Forest can provide for the expected increase need for wilderness recreation is the reason for the nonwilderness recommendation.

Even though the present recommendation for these areas is nonwilderness, there are no major developments planned in the area in the first decade. Vehicle use of the open portion of the San Francisco River canyon will be monitored. These areas will be managed to maintain their semi-primitive recreation opportunities.

The original Proposed Action Alternative would have resulted in lifting the seasonal closure of the San Francisco River. The entire River would have been open to motorized and nonmotorized use year around. The modified Proposed Action Alternative results in a portion of the River being managed for motorized use and a portion being managed for nonmotorized use.

The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to motorized users, but to all unauthorized entry, including recreational hiking. Since the closure was enacted, a study of the canyon done by the Museum of Northern Arizona (Riparian Ecology of the San Francisco River, Carothers, Steven W. et.al, 1982) indicated that at that time the Black Hawk was not

nesting in the main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the river is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the motorized vehicle use of the canyon may cause erosion of the River benches. This conclusion was made by the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where vehicle use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benched regardless of the vehicle use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited off road vehicle use of the canyon has significantly effected the natural erosion rates.

Based on the available data, there does not seem to be any resource related reason to continue the seasonal closure. The vehicle use in the canyon actually peaked at a use level of 1184 recreation visitor days in 1980. Since that time the trend seems to be down. The 1983 data (latest compiled data) indicated a motorized use level of 438 recreation visitor days. Much of this use occurs in a small portion of the canyon. With the use of the River significantly lower now than in 1980 when the closure was initiated, we can find no acceptable resource related justification to continue the seasonal closure.

Even though there is no evidence indicating that the limited vehicle use in the River is causing unacceptable resource damage, there is a conflict between motorized and nonmotorized use. In order to resolve this conflict and provide for both motorized and nonmotorized use of the San Francisco River, a decision has been made to close the River below Mule Creek to vehicle use. The portion of the River above Mule Creek will be opened to motorized vehicle use year around.

Wild And Scenic Rivers

Because of a public concern regarding the Proposed Plan recommendation to not recommend Wild and Scenic River classification, the eligible portions of the San Francisco and Gila Rivers, as detailed in Chapter 3 of the Environmental Impact Statement for the Gila Forest Plan, were reevaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic Rivers Act as amended thereto. Eight criteria were used in this evaluation. Scenic value, recreation value, geologic value, fish and wildlife values, historical, and cultural values. In

Seasonal Closure of The San Francisco River

addition, other criteria contained in the "Guidelines for Evaluating Wild, Scenic, and Recreation River Areas", written by the U.S. Department of Agriculture and the Interior in 1970 were used: free flowing river, meaningful experience opportunity, water volume and water quality. The following describes the Rivers in relation to these attributes.

1. Scenic Value - The scenic qualities within the study area are high with great variety and distinction. The rugged canyon walls, combined with river pools, broken by cobble riffles and riparian vegetation is distinctive in the rugged southwestern states. However, the scenic values are not outstandingly remarkable.

2. Recreational Value - Limited traditional forms of water-based recreation (floating, swimming, and fishing) take place on the River. Neither the quantity or quality of the experience is outstandingly remarkable. Shallow water depths and minimal flows prohibit a quality water based recreational experience. Floating of the Gila River is available mainly in late April to mid May and only when water flows exceed 200 cubic feet per second as measured at the Cliff river gauge. The San Francisco River is floatable for an even more limited period and often not at all. Swimming is available only in small side pools. Pools are very limited on the San Francisco River. Fishing for warm and cold water species is available, however, the opportunities are not outstanding.

3. Geologic Values - Both River canyons afford a spectacular view, as recognized in scenic values, of basalt, basaltic andesite and rhyolite and Gila conglomerate cliffs. However, the formations are not unique nor is there a display of unusual formations or geologic processes. Therefore, it has been determined that the geology of the Rivers are not outstandingly remarkable.

4. Fish and Wildlife Values - Opportunities to view wildlife not common to this area (i.e. Southern Bald Eagles, Black Hawks and Rocky Mountain Bighorn Sheep) near Turkey Creek and in the lower box portion of the San Francisco River makes these portions of the Rivers unique, however, the Gila River area in general and the Alma, New Mexico, Bill Lewis Springs portion and the Luna, New Mexico portions of the San Francisco River are similar to the surrounding lands and are not unique and/or outstandingly remarkable.

5. Historic and Cultural Values - There are no known cultural resources with "outstanding remarkable" values within the River confines. All historic sites are within the boundaries of private land holdings. Known prehistoric sites, consisting of rock shelters, and areas and having ephemeral structures, have been impacted by River action or vandalism. Similar examples of the prehistoric cultures are common throughout the region.

6. Free Flowing River - Proposals and preliminary feasibility studies for major impoundments on the Gila River near Red Rock and Turkey Creek are being considered. The proposed impoundment near Red Rock would back up water in the section of River that flows through the Burro Mountains while the proposed impoundment near Turkey Creek would back up water downstream and upstream from the confluence of Turkey Creek and the Gila River. The area along the eligible sections of the River is also subject to various water and power withdrawals made early in this century. Major water impoundments within the Gila Wilderness would require approval by the President of the United States.

At the headwaters of the San Francisco River near Alpine, Arizona, the Luna Lake Dam impounds water for an approximate 100 surface acre recreation fishing lake. Downstream from this impoundment near Luna, New Mexico and Alma, New Mexico, low dams for diverting irrigation water into ditch systems exist. These structures are of minor significance. However, there are proposals and preliminary feasibility studies for major impoundments at Reserve and Alma, New Mexico. Like the Gila River, the area along the San Francisco River is also subject to various water and power withdrawals made early in this century. The withdrawals on these Rivers place National Forest management in a subordinate role to the purpose for which the withdrawal was made. Although the Rivers are presently free flowing, existing legal encumbrances may permit interruption of the free flowing state.

7. Meaningful Experience, Opportunity, and Water Volume - Some portions of the Rivers provide for meaningful opportunities in terms of scenery. Very limited opportunities exist for boating because of low flows. Boating and/or rafting opportunities exist only during high run-off or flood periods from late April to mid May. Only the lower box portion of the San Francisco River is floatable in certain areas in and around Alma, New Mexico, the San Francisco River actually dries up and goes underground in the summer months. Floatable water does not occur every year, at times two to three year gaps occur between time the River is floatable.

8. Water Quality - With few exceptions, water quality meets the criteria for fish, other aquatic life, and wildlife as defined in the Chapter on "aesthetics" of Water Quality Criteria, Federal Water Pollution Control Administration, April 1, 1968.

In addition to the evaluation criteria just discussed, the following were also weighed as whether or not to recommend the River for classification under authority of the Wild and Scenic Rivers Act

1. The Bureau of Reclamation is currently evaluating alternatives in the upper Gila Water Study. Potential sites near Red Rock and Turkey Creek have been identified. Wild and Scenic designation may preclude considerations of these alternatives.

2. Man's impact on the River, with the exception of private lands, has been negligible to date and is expected to remain so for the first planning decade. Limited access will curtail large influxes of people. The section of River from the Forks to Turkey Creek is presently classified as wilderness which further insures that man's impact on this portion of the River will be minimal

3. Existing uses within the eligible portions are compatible with and non-intrusive to the River. It is not expected that use is likely to significantly change until the Plan is revised, due to the poor access to the areas.

4. Management tools, such as laws, regulations, and policies are existing and are available to resolve conflicts of uses that are likely to arise.

Based on the foregoing discussion of the Gila and San Francisco River attributes and liabilities in light of the evaluation criteria, it has been determined that the eligible portions of the Rivers, as specified in Chapter 3 of the Environmental Impact Statement for the Gila Forest Plan, are not and do not contain outstandingly remarkable characteristics that are required for designation under the authority of the Wild and Scenic Rivers Act. Also contributing to the decision was the fact that the 28 mile section from the Forks to Turkey Creek is already protected under the provisions of the 1964 Wilderness Act.

Trail Maintenance

Trail maintenance had been increased above current levels in the original Proposed Action Alternative. In the modified Proposed Action Alternative trail maintenance has been increased further. Implementation of the modified Proposed Action Alternative would result in a trail maintenance budget 288 percent higher than the 1984 trail maintenance budget. This should result in upgrading approximately 65 percent of the substandard trails to prescribed levels. A substantial improvement should occur in the first decade. Trail construction and reconstruction was increased 18 percent in the first decade.

Recreation

Developed recreation would stay at the level projected in the original Proposed Action Alternative. Semi-primitive recreation opportunities would be higher than in the original Proposed Action Alternative.

Range

Since the creation of the National Forest System, significant progress has been made to improve the productivity of rangelands on the Forest. This progress has resulted from improved management by the Forest Service and Forest grazing permittees and has been especially evident in the past decade. In 1975 only 74 grazing allotments out of 152 (49 percent) were under satisfactory management. By 1985, 96 allotments out of 141 (68 percent) were under satisfactory management. Forestwide, range condition and trend has also improved. There are, however, still problem areas on the Forest where past range monitoring indicates that permitted numbers exceed capacity. The Forest Plan addresses management of all rangelands for multiple uses and the resolution of problems where they presently exist.

The draft Plan did not adequately explain the above situation. As a result, the Plan emphasis description and some portions of the EIS were changed to better describe the grazing situation and the management direction needed to continue to improve the range resource. To better coordinate the range and wildlife emphasis, some adjustments were made on individual management areas. Over the entire Forest, however, the level of range management would stay the same as the level projected in the original Proposed Action Alternative. Forest permitted numbers are expected to decline to 350,000 animal unit months and capacity will be increased to 350,000 animal unit months. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

This 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other Forest resources that require forage. This level would maintain approximately 90 percent of the 383,000 animal unit months of permitted domestic livestock grazing while improving environmental quality. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. The Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

Wildlife

The recreation associated with wildlife is expected to stay at approximately the level projected in the original Proposed Action Alternative. Wildlife coordination would increase somewhat on the suitable timber portions so that wildlife goals can be integrated with timber goals in these areas. This should result in increased wildlife habitat diversity in the timber harvest areas. Because of reduced timber harvest, old growth habitat would be reduced only slightly in the first decade and is projected to be reduced by only 12 percent in five decades. The original Proposed Action Alternative would have resulted in a 24 percent reduction.

Riparian

Many of the people that commented on the Plan mentioned the importance of riparian habitat. To clarify our management objectives, the following standards and guidelines have been added to the Forestwide Standards and Guidelines

- Where possible, road construction will be avoided in riparian areas.
- Timber harvest adjacent to riparian zones will be conducted in a manner that will provide for protection of these key areas.
- Grazing in riparian zones will be managed to provide for maintenance and improvement of these important areas.
- Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources
- Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the Standards and Guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These standards and guidelines establish specific long term riparian condition goals.

The changes in the Proposed Action Alternative are expected to result in an increase in riparian habitat condition over time. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

COMMENTS ON THE DRAFT PLANNING DOCUMENTS AND THE FOREST SERVICE RESPONSE

Following are the letters that the Forest Service received concerning the draft planning documents. Specific comments are bracketed and numbered. The Forest Service response to each numbered comment is included to the right of the comment.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I



TONY ANAYA
GOVERNOR

STATE OF NEW MEXICO
OFFICE OF THE GOVERNOR
SANTA FE
87503

000001

October 9, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2810 North Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

Enclosed for your information and response are comments on the Proposed Forest Management Plan/Draft Environmental Impact Statement from the following state agencies, New Mexico Department of Agriculture, the Historic Preservation Office, Department of Natural Resources and the Department of Game and Fish. Additionally, the State, through the Natural Resources Department, retained the services of Mr. Randall O'Toole for Plan analysis and recommendations. Mr. O'Toole's analysis is also enclosed.

While state agency comments reflect the mandates and responsibilities distinctive to a given agency, there is clearly uniform agency dissatisfaction with the plan.

A prudent management course, which I strongly recommend, would be to use the enclosed comments as a basis for redrafting the proposed forest management plan and environmental impact statement with particular attention given to a re-examination of values used for timber harvest, grazing and recreation. I believe you will find Mr. O'Toole and the Natural Resources Department analysis to be most helpful in this regard.

I continue to offer the expertise of my staff and state agencies in the development of a new plan which will more realistically reflect the unique character of New Mexico forests and will be responsive to the needs and values of New Mexicans.

Sincerely,

TONY ANAYA
Governor

TA/sr/ejo

Enclosures

cc M. J. Hassell, Regional Forester

TS	WL	DI	DP
DEP	ANG	WJE	A/S
NS	TR	OFE	PERS
TM	FMA	RAD	REC
FM	WS	TP	PA
ES	SOH	FE	COM
RL	DISP	LS	MAN
TRP	LA	WCI	DT TO
AS	ARC		RES

NOV 15 1985
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LETTER I

FOREST SERVICE RESPONSE TO LETTER I



STATE OF NEW MEXICO
NATURAL RESOURCES DEPARTMENT

Santa Fe 87503
(505) 827 7835

LEO GRIEGO
SECRETARY

October 8, 1985

Mr. Kenneth C. Scoggin, Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

This letter is to provide you the Natural Resource Department's analysis and recommendations on the 1985 Proposed Gila National Forest Plan and the accompanying Draft Environmental Impact Statement. These recommendations were developed through discussions with the Resource Management and Development, Forestry, Soil and Water Conservation, and Park and Recreation Divisions. As such, this represents an integrated analysis by the Natural Resources Department. Also, an economic analysis conducted by Cascade Holistic Environmental Consultants was utilized in establishing the recommendations.

The method used in preparing these comments is as follows. First, the Natural Resources Department conducts a technical review to establish the plan's accuracy. Issues related to the validity of the information, National Environmental Policy Act compliance, and the possibility for natural resource degradation are addressed. Second, specific recommendations for improvements in management are made using policies set by the Governor. Thus, resource protection is considered primarily, then management emphasis follows in order to provide direction to the forest on the needs of the state.

We were unable to identify an alternative that fully responded to our concerns due to the complexity of the information and the manner in which it was presented. We are cognizant of the fact that planning programs of this nature involve incredible arrays of interrelated resources and management issues that make preparation of a forest-wide plan that is both comprehensible and concise very difficult. We appreciate the opportunity to review these documents and to provide you with comments. We look forward to establishing an ongoing relationship between our agencies.

One procedural concern regarding to the National Environmental Policy Act that we have is related to the requirement for public input. The Gila Forest staff indicated a willingness to meet and discuss the documents but resisted attending or holding public meetings for that purpose. Instead they preferred a system of meeting one-on-one with concerned individuals to derive specific recommendations. On one hand, this would serve to intensify information exchanged with the people who would step forward; on the other hand, it may have acted to scare off citizens and possibly prevented a full exchange of views. We respectfully recommend this alternative public input process not be repeated for future plans.

Sincerely,

Leo Griego
LEO GRIEGO
Secretary

CC/jp

1-1

We disagree that our approach to public involvement was inappropriate. An extensive effort was made to inform the public of the Plan and its availability and to provide a means for any interested individuals or groups to get more information and provide comments. The results were satisfactory and the contacts made are continuing as the final Plan is being developed. We are optimistic that the relationships established will continue into implementation. Contrary to conventional public involvement theory, the State seems to believe that there is a silent majority that is anxious to participate in general public meetings. Our past experience with public meetings confirms current thinking on public involvement that the public is a collection of different special interests and that there is no silent majority. Our goal was to provide the most effective forum to reach the interested public and we feel that we accomplished that goal. See our response to the New Mexico Department of Agriculture comment #1 for more discussion of our public involvement effort.

LETTER 1

FOREST SERVICE RESPONSE TO LETTER 1

I. PROPOSED GILA NATIONAL FOREST PLAN

Issues, Concerns, and Opportunities Plan, pages 5-8

The Natural Resources Department (NRD) reviewed the eight ICOs and found two elements that are in need of additional definition. The recreational opportunity section made no reference to developed recreation. It is agreed that the dispersed recreation demand is increasing. However, this does not warrant discussion of dispersed recreation to the exclusion of developed recreation. Language in the recreation opportunity section should address developed recreation.

The second element found to be lacking is a discussion of watershed conditions. Because they are the basis for land productivity, watersheds should be given ICO status. NRDs concerns include in part riparian habitat damaged in recent flooding, range management issues, and timber harvest concerns.

Summary of the Management Situation Plan, pages 9-20

The summary of the management situation utilizes potential supply and projected future use to display the need for improvements, to resolve current public issues, and to prevent future conflict. NRD has a technical concern that future

demand is equated with projected future use. We request that the overview section outline the method of equating projected future use to projected future demand.

The Natural Resources Department does not agree that a pulp mill will be built in the state within the next twenty years unless significant changes in technology occur. We request that the basis for this projection be described. Also, please provide a description of what the effects of supply and projected future use would be if the mill were not built.

1-2

Issues, concerns, and opportunities (ICO) were identified to focus the scope of the Plan and Environmental Impact Statement. The most significant ICO's were selected for emphasis in the process. Developed recreation was not a significant issue on the Gila. Because developed recreation was not selected as a major issue does not, however, mean it was not considered and addressed in the Plan and EIS. Developed recreation is included in all alternatives described in Chapter 2. The existing developed recreation situation is described in Chapter 3, and the effects of the alternatives on developed recreation are displayed in Chapter 4. We continue to feel that developed recreation is not a major issue on the Gila. We believe that the present list of ICO's accurately represents the major issues on the Forest.

1-3

While watershed conditions are very important, we believe that most watershed condition concerns are embodied in the grazing and riparian issues. Existing watershed conditions are described in Chapter 3 of the EIS, and the effects of the alternatives on watershed conditions are described in Chapter 4.

1-4

It is correct that projected future use and demand have been equated. Demand is technically a price/quantity relationship considering future estimates of consumer income, consumer tastes, technological advances, relative supplies and prices of all substitutes, relative supplies and prices of all other goods, etc. This approach is the favored approach in theoretical micro-economics and would result in conventional supply demand schedules. However, the Forest did not use this classic approach to estimate demand because of the exhaustive funding and time required. Instead, a more practical approach was used that assumed that prices would remain constant and therefore demand would be responsive to population growth and follow historic trends. The approach used was practical and adequately represents the needs for goods and services for the plan period. Since the needed goods and services were not technically demand in the classic sense, the estimated needs were called projected future use. Since the term "projected future use" appears to be confusing, it will be changed to "demand" throughout the documents. See our response to your comment # 22 for additional information on demand.

1-5

The reference to the potential pulp mill was to a potential mill at McNary, Arizona. The potential mill was not considered in any of the demand calculations or calculations of allowable sale quantity. The statement was made to indicate that demand for small material might increase if a new mill were built. The amount of material required was not estimated. The reference to a new mill has been deleted.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

The list of plants nominated for federal protection as threatened or endangered species indicated on page 20 and page 68 of the Draft Environmental Impact Statement is significantly lacking in completeness. Many of the state and federal Priority 1 and 2 plants should be identified in the plan. They are as follows

Cirsium gilense - This species is endemic to New Mexico found only in the Gila National Forest in Catron county. It is found in damp meadows and near streams. These riparian and semiriparian habitats are often hardest hit by vegetation management practices. As such we feel that it qualifies at least as a unique species and more appropriately as a sensitive element

Erigeron scopulinus - This species is known only from the Chiricahua Mountains of Arizona and in the Gila Forest of New Mexico. It is endemic to cliff faces of rhyolitic rock and is

less common than Silene wrightii which occupies the same habitat and is listed as unique in this document

Apacheria chiricahuensis - This species is known only from southeast Arizona and the Gila Forest in New Mexico. It is nowhere common and occupies a unique cliff face habitat. It is certainly worthy of designation as a unique species.

Trifolium longipes var neurophyllum - This species is at present documented from only two locations, one in Arizona and one in New Mexico. It occurs in the Gila Forest in Catron County. Because of its apparent rarity,, we feel it should be on the Forest sensitive list.

Mammillaria wrightii - This species is on the New Mexico State Endangered Species List. It is rare in the state and is impacted by cattle grazing. It occurs in the Burro Mountains in the Gila Forest and we feel that it should be on the Forest's Sensitive List.

Senecio cardamine - This species is known only from eastern Arizona and west central New Mexico. It occurs on the Gila Forest in Catron County. We feel that it should be included on the unique species list.

1-8

The section of the DEIS that you reference has been rewritten.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

We have specific management concerns in Management areas 4A and 4D as well as the area around Willow Creek east of Mogollon. This limited area forms the core of the Allium goodingii and Senecio quarens population in New Mexico. These species are both primarily riparian in nature and susceptible to

flooding. Unfortunately several large floods have occurred in the Glenwood area in the last 10 years. As such, much of the Senecio quarens and Allium goodingii populations in these areas have been adversely affected by these floods and in some cases have been extirpated. To reduce the scope and impact of such floods, we suggest that the Forest Service curtail cutting timber in the upper 1/4 mile of the drainages. These smaller header canyons are often the best remaining habitat for these species, and the runoff from flooding in these areas is almost certainly increased by removing the timber and other foliage. Through careful management of these header canyon areas a seed source can be maintained that will reseed the lower canyons after flood destruction.

Management Direction Plan, pages 21-281

No standards and guidelines for road density were found. This is a significant concern for the Natural Resources Department. Other forests have set density constraints of 3 to 5 miles of road per square mile. Any greater densities cannot be supported. Also, if no density constraints were used, please describe what the effect on the harvest levels would be if three miles of road per square mile were used in the FORPLAN model. Specific management direction related to the Continental Divide trail could not be found, (page 24). We respectfully request that the Continental Divide trail corridor be delineated in the plan with potential alignment shown on the maps.

The Visual Quality Objectives, outlined on page 32, describe acceptable variations ranging from + or - 10% from acreages presented for specific management areas. However, the next sentence indicates one classification movement downward will be tolerated. We request that this sentence be removed due to its effect of negating the previous classification of acceptable variance.

1-7

There has been virtually no past timber harvest in Management Areas 4A and 4D, and timber harvest has not contributed to flood problems around Glenwood. The upper quarter mile of the suggested drainages are in wilderness and undeveloped areas. There are no proposed timber sales in Management Area 4B during the life of the Plan. Only about 3100 acres of Management Area 4A would be harvested. This should not significantly effect water yield from the entire area. Project planning will insure protection of any threatened species found in the area.

1-8

We agree that the road densities should be displayed. No management areas have road densities that exceed five miles per square mile. The planned road densities of open roads for each management area have been added to the Plan.

1-9

The potential corridor was shown on the transportation map included with the EIS and Plan.

1-10

The sentence was not removed. The sentence is necessary because it states how much the Visual Quality Objective can be lowered and still be an acceptable variation. For example, Retention can only be reduced to Partial Retention. If Retention were to be reduced to modification it would not be an acceptable variation. There also is a parameter that deals with how much of an area can be lowered and still be an acceptable variation. This is stated in terms of a percentage of the acres of a VQO in a particular management area. For example, only 2% of the acres in foreground Retention can be lowered and it still be an acceptable variation.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

The Recreation Administration section, on pages 32 and 33, indicates a maximum allowable camping period of 30 days in a 45 day consecutive period. This differs significantly from the state park camping regulations which require a 5-day absence after 14 consecutive days. We request that the Forest consider the opportunity to work with the state to consolidate policies in order to reduce confusion to the public. As a point of clarification, this regulation citation should specify whether this applies to developed or dispersed camping sites or both.

The timber management section refers to silvicultural exams for the management of timber stands. Recent advances in silvicultural management techniques may have a profoundly positive effect on overall forest management. Specifically the integrated stand management tracking system is being implemented throughout the region. We request that ISM be referenced and explained in the final plan and/or Environmental Impact Statement.

Also in the Timber Management Section, the standards and guidelines provide fairly precise information for timber stand improvement. Yet regeneration standards and guidelines are not specified, with the exception of referencing the regional guide. We request the regeneration standards and guidelines be provided in this section to provide more information.

The various Management Area standards and guidelines display the overstory removal guidelines for the suitable time entered by decade. The acreages by removal in some cases are very small, see page 99. Please describe how the forest staff will combine removals or adjust entries in a logical manner.

The activity code No D08 on page 213 and elsewhere was not identified. We anticipate it is related to Research Natural Areas but need further definition of the specific activity. Please cross check activity codes with the Activity Code Index to assure full coverage.

1-11

We agree. The Plan is incorrect and will be revised to clarify the stay limitations. The stay limit of 30 days in a 45 day period applies to general dispersed recreation. Stay limits in most developed sites is 14 days and is consistent with the State's policy.

1-12

We agree. Integrated stand management will be referenced in the Plan.

1-13

We agree. The plan will include regeneration standards and guidelines.

1-14

The Plan has been changed so that only entries during the plan period are shown. This will clear up some of the confusion. There will still be some small areas where a three to five step shelterwood system will be used. The normal regeneration shelterwood system is a two step shelterwood system as most commonly shown in the standards and guidelines. The small areas where more than two entries will be used are areas of critical wildlife habitat, such as turkey roost areas, that require special treatment. These small areas of removal harvest would be combined with other harvests in the same area.

1-15

Research natural areas have been broken out into a separate management area and appropriate standards and guidelines added. The D08 code is correct for the ecosystem studies. The D08 code has been added to the Activity Code Index.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

II. DRAFT ENVIRONMENTAL IMPACT STATEMENT

Wilderness Study Areas, pages 94 - 96

We found the criteria used for not recommending the two wilderness study areas for wilderness designation somewhat cryptic. We would propose that the Hell's Hole Wilderness Study Area is rugged enough to be somewhat self protected but will require some form of management that will preserve its unique values. The Lower San Francisco Wilderness Study Area should be classified and managed as wilderness. The Wild and Scenic River designation for the San Francisco and Gila rivers should be pursued and adopted as indicated in Alternative F.

The Natural Resources Department has found a contradiction in objectives and intent with regard to road maintenance on pages 117 through 119. The current maintenance levels on the numerous system roads are described as inadequate on page 117. The road system will continue to deteriorate in the first period according to page 118. The proposed action alternative is also described as having the most miles of constructed roads. Although this will provide improved access, the reduced maintenance condition will cause lower safety and restricted access on some roads. The Natural Resources Department is extremely concerned that the continued road construction coupled with less than sufficient maintenance will result in self perpetuating road deterioration. Therefore, it is essential that the road maintenance be increased and the road construction be reduced so that road deterioration and the resultant soil erosion problems can be addressed.

Language in the management portion of the plan indicates Forest officers may keep temporary roads open for administrative purposes. This language is overly permissive and may result in unwarranted establishment of permanent roads. Please include

language that would require a reasonable analysis prior to the administrative opening of a temporary road. Written documentation would also serve to facilitate the monitoring of Forest road mileage and maintenance.

Consultation with Others, pages 141-156

1-16

We have reevaluated our recommendation on the two Wilderness Study Areas, and continue to support the nonwilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

The eligible portions of the San Francisco and Gila Rivers, as detailed in Table 35 and 36 of the draft Environmental Impact Statement for the Gila Forest Plan, were reevaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1 (b) of the Wild and Scenic Rivers Act as amended thereto. Again, refer to the Proposed Action Changes Summary for a discussion of the rationale for the decision regarding wild and scenic river designation.

1-17

We agree that road maintenance needs to be increased over the current level. The maintenance identified in the PA alternative has been increased to help resolve this concern. We have also revised the EIS to clarify the proposed road construction and maintenance policy on the Forest.

The primary road maintenance cost on the Forest is associated with arterial and collector roads. This road system is essentially in place, so the Proposed Action Alternative does not propose to construct a significant number of miles of these types of roads. Most of the road construction on the Forest would be local roads used to harvest timber. The timber purchaser is responsible for the maintenance of local haul roads during the time that timber is being harvested. We anticipate that approximately 65 percent of these roads will be closed after timber harvest activities are completed. The roads left open will be properly drained and will be used lightly. This will result in low maintenance costs on the local roads that remain open.

1-18

You did not provide a reference and we could find no reference in the Plan relating to keeping temporary roads open for administrative purposes. There is a standard and guideline on page 38 of the DEIS which states "Close all

local roads that are not essential for management needs upon completion of sale and firewood activities". We assume this must be the standard and guideline you are referencing. Local roads are not temporary roads. Local roads are part of the permanent transportation system. Since local roads are often single purpose roads usually associated with timber management, they are often closed between periods of use if they are not essential for other management activities. You imply that these roads would only be open for administrative use. However, if the evaluation shows that the roads are essential for other management purposes, then the roads would remain open. They would be available for public use.

LETTER 1

The Soil and Water Conservation Division recommends that the following Soil and Water Conservation districts be involved in the planning process

Grant SWCD

Hidalgo SWCD

Quemado SWCD

Salado SWCD

Sierra SWCD

Socorro SWCD

Analysis Areas, pages 195-206

In studying the management areas, we found the size of many of the analysis areas to be too large to be managed under one prescription. This is especially true in the southern portion of the forest. It is difficult to believe that management techniques in these large areas will be of a consistent nature. The forest staff may benefit from a re-analysis of these large analysis areas to see if they should be subdivided.

NRD disagrees with the statement on page 208 concerning watershed condition. Given the three-decade time lag in range capacity meeting use, the watershed condition should receive a

special emphasis level in the prescriptions. This would provide a sensitivity analysis for range and timber activities to assure the watershed condition and long term soil productivity could be optimized.

III ECONOMICS ANALYSIS

This section takes an economic perspective and refers to both documents. The preliminary report was developed by Cascade Holistic Environmental Consultants. The Natural Resources Department has used those portions of the report which it deems most appropriate, as well as providing additional comment.

FOREST SERVICE RESPONSE TO LETTER 1

1-19

Extensive efforts were made to notify any individuals or groups that might be interested in the Plan. No members or officials of the Soil and Water Conservation Districts requested information. Also, a number of individuals on our mailing lists are also members of the Soil and Water Conservation Districts. Copies of the final Plan and EIS will be sent to the listed districts.

1-20

We disagree. The purpose of the Plan is to provide direction for the Gila National Forest for the next 10-15 years. This direction is contained in the standards and guidelines, implementation schedules, and schedules of outputs in sufficient detail so that subsequent activities can be based on and be consistent with the Forest Plan. The Plan is a programmatic document and contains a level of detail consistent with program level direction. There was no intention, and no attempt was made, to do site specific project level analysis during forest planning. As pointed out on page 2 of the draft EIS and Plan, Forest planning documents will be used for tiering and additional analysis will be done on site specific project design.

It is also important to note that management areas and the analysis areas used in the FORPLAN model are not synonymous. The FORPLAN model contained 226 model analysis areas that represented different parts of the Forest. Outputs, costs, and effects were tracked for each of these areas. The largest subdivision making up these analysis areas is what was used as a management area in the Plan. Where standards and guidelines were required to address more specific areas, the appropriate area was indicated next to the standard and guideline. We have reviewed the delineations and believe them to be adequate to provide the programmatic direction described above and to produce the planned results. All site specific project design can and will be guided by the management area prescriptions. Since you did not suggest how large management areas should be, or suggest any rationale for areas of a different size, we are unable to respond more specifically.

1-21

The reference paragraph on page 208 is part of the discussion of the prescription development process. In the initial steps of the planning process, single emphasis prescriptions were developed for watershed condition and single resource emphasis benchmarks were run to determine the Forest's capability to produce various goods and services and their cost of production. The costs of maximizing watershed condition to the exclusion of other resources was exceptionally costly. As shown in Table 88, the Maximum Watershed Condition Benchmark had the lowest PNW of any of the benchmarks, being 12 percent lower than even the Low Intensity Benchmark. Because the watershed emphasis prescriptions would obviously never come into solution in any alternative run and because watershed emphasis was integrated with other resources in the multiple use prescriptions used in the final model, the single emphasis watershed condition prescriptions were eliminated.

Demand

Demand is accurately defined in Forest Service planning rules as a price-quantity relationship. At higher prices, consumers will demand less of a good, while at lower prices consumers will demand more. While the rules require planners to use demand in this sense, the Forest Service instead equates demand with the use of a good at current prices.

For example, a document prepared by Gila planners called the "analysis of the management situation" (AMS) has this to say about demand for domestic grazing

Demand for livestock grazing currently exceeds the production capability of the Gila National Forest. This is verified by the fact that permitted use on the Forest currently exceeds current capacity. The only way this current demand can be satisfied is with a large expenditure on new improvements and maintenance of existing improvements. As a result of this situation, Forest personnel felt that nothing would be gained by trying to project future use trends.

On the same subject, the EIS simply says "It is assumed that the demand for permitted use will be sufficient to match capacity in any alternative" (page 71). At a high enough grazing fee, the quantity of forage demanded for livestock grazing would be certain to fall below current capacity. A good reason to estimate future use is the possibility that future fees will not remain the same as current fees. An increase in fees may lead to a decrease in use. The Forest Service made no attempt to estimate these effects.

Similar problems exist for timber. The AMS says,

The long term demand for lumber and paper products is expected to increase. Economic conditions of the last few years have softened the demand, but are expected to reverse as the recovery continues and the economy strengthens. Since little pulpwood has been removed from the Forest and projected use would be highly speculative, no future use trends have been plotted. This product has, however, been valued in the model (at \$17.20 per thousand board feet).

The EIS notes that future timber use projections are based on the *Outlook for Timber in the United States*, a Forest Service publication prepared in 1972. The *Outlook for Timber* used "demand" in the same way that Gila Forest Service planners applied the term to range use at current prices. The tripling in demand projected by the *Outlook* assumed that timber prices

1-22

The Forest did not estimate demand for sawtimber and products using all of the explanatory variables which might be suggested by conventional economic theory.

As stated before, the Gila used the approach of examining the historic pattern of sales. The future need figures used in the draft Environmental Impact Statement were based on the timber sold between 1971 and 1980. The data used for this projection is displayed in the draft Environmental Impact Statement in Table 21. Table 21 was also intended to show the timber sold in 1981 through 1984 and the average volume sold during the 10 to 15 year period. During the public involvement period, we discovered that the information for the last four years in the table was timber offered, not timber sold. This table has been corrected and a new average has been calculated based on the corrected information for 10 to 15 years. This average is considered to be the demand in the first decade. The existing mill capacity is above this figure. Considering the existing mill capacity and the volumes that have been sold in years when the economy was strong, we have now projected the long term demand level to be approximately 30 MMBF. The timber issue discussion has been modified to reflect this level. The proposed action has been modified and has an allowable sale quantity equal to the average volume sold in the last 10 to 15 years.

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

remained constant. This implicitly assumes a change in the underlying conditions which define the demand function. An increase in timber prices will reduce the quantity of timber demanded from the national forests unless there are significant changes in the market conditions which create the demand.

Planners extended this assumption to pulpwood (trees smaller than nine inches in diameter). Although sales of this size timber have been negligible and require heavy subsidies, the Forest Service assumed that it is worth nearly three times the prices recently bid for Douglas-fir sawtimber.

The Forest Service has assumed increasing quantity demanded, as well as increasing prices. The NRD would prefer to have the Forest Service construct demand functions containing clear assumptions. The Forest Service would then be able to provide estimates for several reasonable economic scenarios. Because the Forest Service has not constructed accurate demand functions, the benefits are lower than claimed in the Plan. The Forest Service should not equate "use at current prices" with demand. Moreover, they should make estimates of demand as a price-quantity relationship for both grazing and timber.

Less inaccuracy exists regarding recreation demand. Planners estimate that the current capacity for most forms of recreation greatly exceeds current use. Forest-wide, the capacity for developed recreation is about 321,000 visitor days, while current use is only 151,200. The capacity for dispersed recreation (not including wildlife-oriented recreation or wilderness recreation) is estimated to be 5,575,270 visitor days, while current use is only 402,700 visitor days.

Use is expected to increase at fixed rates. For example, dispersed recreation use is expected to increase by two percent per year, which compounded annually would be 22 percent in 10 years and 170 percent in 50 years. However, planners neglected to compound this increase and assumed use would increase by 23 percent in 10 years and 100 percent in 50 years.

Even correcting for this mathematical error, it will take

LETTER I

well over 30 years for developed recreation use to exceed current capacity. This implies that the variation of most recreation outputs among alternatives will be small. Planners correctly assessed this as shown in table 9 on page 45 of the EIS.

Despite data in table 9, the Forest Service claimed value in the text of the EIS for recreation opportunities provided by new roads. As page 33 of the EIS says, "Timber activities in [the preferred] alternative will result in the largest roaded area by the end of the 5th decade." The proposed action will also maintain the highest number of miles of high-standard roads (EIS page 36). Planners claim that these roads will increase the percentage of the forest providing "motorized recreation experience" (EIS page 32). However, motorized recreation use will remain about the same for all alternatives. Therefore, recreation should not be used to justify Forest roads. The NRD is concerned that lack of maintenance in the existing developed sites will also reduce their potential and enhancement of existing sites is likely to have a positive impact on visitation.

Dispersed recreation capacity in general on this district greatly exceeds use, and at a two percent rate of increase, use will not reach capacity for 140 years. One area where use is expected to quickly reach capacity is in primitive recreation on the Glenwood Ranger District where the San Francisco River and Hell's Hole roadless areas are located. Primitive recreation capacity is estimated to be about 13,800 visitor days per year. Current use is 11,800 visitor days. At the two percent rate of increase, use will reach capacity in only eight years from 1981, when the use figures were estimated. The Forest Service should provide formal protection to these two roadless areas and encourage use of other primitive areas.

Table 9 of the EIS does show a major variation in wildlife recreation outputs. Rather than using capacity-use relationships as an indicator of potential wildlife recreation, planners assumed that increases in wildlife populations would "draw" recreationists to the Forest. Alternatives which were

FOREST SERVICE RESPONSE TO LETTER I

1-23

You stated in your comment that the Forest claimed value in the text of the DEIS for recreation opportunities provided by new roads to justify roads in the Forest Plan. We disagree. You did not provide a page reference and we could find no instances in the DEIS where road construction was justified on the basis of recreation. We agree that new road construction will not significantly increase total dispersed recreation use. This is clearly disclosed on page 45 which shows that dispersed recreation does not vary between alternatives.

New road construction will, however, change the nature of the dispersed recreation use. New road construction results in fewer acres available in the semi-primitive recreation opportunity class and more acres available in the roaded natural opportunity class. Because supply exceeds demand, the total dispersed recreation use in each class will not change, but use in the semi-primitive class will be slightly more concentrated and use in the roaded natural class will be spread over more roads and acres. This relationship is described on pages 91, 92, and 118 of the EIS.

1-24

We disagree with your interpretation of the data on wilderness use and capacity on the Glenwood District portion of the Gila Wilderness. This data is not meaningful unless considered in relationship to the capacity of the Gila Wilderness as a whole. A minor part of the Gila Wilderness is located in Management Areas 4C and 4D on the Glenwood District. The planning records you cited contain estimates of present use and capacity for these two management areas. However, nearly all of the present use is at trail heads from which visitors to the Gila Wilderness disperse themselves throughout the Wilderness.

The present use and estimated capacity for the Glenwood District portion of the Gila Wilderness cannot be used out of context by themselves to draw conclusions about the need for additional wilderness. The Gila Wilderness is not close to being used near capacity. Capacity for the Gila Wilderness is estimated to be about 513,000 RVDs. Current use is about 117,000 RVDs and using the 170 percent factor you suggest, current use could be expected to grow to about 199,000 RVDs in 50 years. In 50 years, capacity would still exceed projected use by 257 percent. In addition, the Blue Range Wilderness in the Glenwood Area, is virtually unused. Present use on the Blue Range Wilderness is about 1,000 RVDs and capacity is about 40,000 RVDs. Capacity thus exceeds use by 4,000 percent. Similarly, the nearby Aldo Leopold Wilderness has capacity that exceeds use by 1689 percent. Capacity and use figures do not indicate a need for more wilderness recreation opportunities in the area in the foreseeable future.

1-25

designed to increase wildlife produced more wildlife recreation Table 9 shows that alternative F - the amenity alternative - produces far more wildlife recreation (and, in effect, more wildlife) than the preferred or any other alternative This difference increases over time, as wildlife recreation in the preferred alternative steadily declines while wildlife recreation in the amenity alternative steadily increases It is difficult to determine just how much of this additional

25

recreation is due to reduced levels of timber and domestic grazing and how much is due to increased funds for wildlife habitat improvement measures The amenity alternative requires a significantly larger budget for wildlife

Alternatives with greater amounts of timber cutting greatly reduce diversity For example, 200 years from now the preferred alternative is expected to have 91 percent of tentatively suitable timber lands in early successional stages By comparison, the amenity alternative will have only 46 percent of timber lands in early successional stages

26

Planners identified five critical habitat types on the Forest old-growth, thermal cover, turkey roosting sites, squirrel nesting sites, and herbaceous forage and cover. All but the last, which is not generally found on timbered areas, are expected to be reduced by the preferred alternative Thus, it appears that timber management, grazing, roads, and other development will do little to improve developed or wildlife related recreation values on the Forest Any development justified on this basis should be eliminated.

27

Timber Benefits versus Costs

Although the Gila EIS displays the benefits of the Plan by resource, the EIS fails to present the costs by resource. Yet those costs are calculated in FORPLAN The preferred alternative FORPLAN run indicates that sale preparation and administration for the proposed level of timber sales in the

28

Plan will cost \$478,500 per year Purchaser built roads, including Forest Service engineering, construction, reconstruction, and maintenance, will cost \$1,094,700 per year. In addition, these Forest Service expects to spend \$319,000 per year on reforestation and timber stand improvement.

The wildlife recreation outputs were based on capacity/use relationships. Demand for wildlife recreation use was estimated and it was assumed that wildlife recreation use would occur up to the estimated demand level as long as capacity was available. There is presently more demand, particularly for big game hunting, than is being satisfied. Therefore, it was assumed that increases in wildlife populations, particularly increases in big game populations, would satisfy more of the unmet demand and would result in more wildlife related recreation.

Alternative F results in habitat conditions that will stimulate the greatest increase in wildlife related recreation. The Proposed Action also results in a steady increase in wildlife populations and recreation rather than a decrease as you suggest.

1-26

We disagree that the original Proposed Action greatly reduces diversity. You stated that "Alternatives with greater amounts of timber cutting greatly reduce diversity". Diversity is affected by the mix of early and late successional stages and the distribution and juxtaposition of age classes. Large areas characterized by a single vegetative type of single successional stage have lower levels of diversity than smaller areas having a better mix. Diversity is also affected by the level of wildlife planning, improvement, coordination, and the level of prescribed fire (EIS, page 109).

All of these diversity factors were analyzed for each alternative. As was shown in DEIS Table 57, diversity increased under the original Proposed Action rather than being greatly reduced as you suggest. You stated that the Proposed Action results in 91 percent of the suitable timberland being in early successional stages and that Alternative F has 46 percent of the suitable timber land in early successional stages. In order to reach this conclusion all age classes from 0-120 years old would have to be considered early successional stages. We do not agree with that assumption but even if 0-120 years is used as early successional stages, it is not appropriate to consider only suitable timber in the consideration of the effects of any alternative on diversity.

There are presently approximately 885,000 acres of timbered area on the Forest (Ponderosa pine and mixed conifer). Of this forested acreage, approximately 35 percent exists as old growth. At the end of 50 years, the original Proposed Action Alternative projected a mix of age classes with approximately 26 percent old growth. Since there is suitable and unsuitable timber scattered throughout the Forest, there would be old growth stands scattered throughout the Forest. Even if all 0-120 age timberlands are considered early successional stages and old growth is considered late

successional stage, this is not a great reduction in diversity. In Alternative F, the projected fifth decade mix would result in approximately 30 percent old growth.

In the final Plan the projected timber harvest activities have been modified. This would result in the retention of more of the old growth acres on the Forest. At the end of 50 years, the modified Proposed Action Alternative projects an age class mix containing 30 percent old growth.

LETTER 1

Although some of the road costs are "capital investments," nearly half of these costs--\$406,000 per year--are maintenance. Maintenance costs are expected to increase over time to over \$500,000 per year and will be required as long as the timber program is continued. Thus, the timber sale program alone, which is expected to gross less than \$1 million per year, will cost \$884,500 per year simply to administer sales and maintain needed roads. "Investments" in new road construction, reforestation, and timber stand improvement will cost over \$1 million per year.

Costs are especially high when compared with the receipts for sales in mixed conifer forests. This type of timber has low values and must be "cross-subsidized" by selling in combination with other, higher valued timber. In addition, management in roadless areas and on low sites is likely to produce minimal returns.

In designing harvest areas the Forest Service should attempt to maximize net benefits. Cross-subsidization on all types of high cost harvest areas which are not contiguous with low-cost harvest areas should be justified explicitly on the basis of other values created. All costs including road construction and maintenance over the entire management cycle should be counted when computing net benefits. To do otherwise masks a situation in which the Forest Service is creating a net loss. If a road is to be subsidized because of other benefits, these benefits should be listed and calculated explicitly.

FOREST SERVICE RESPONSE TO LETTER 1

1-27

We disagree with the conclusion you reached that the Proposed Action does little to improve developed or wildlife related recreation on the Forest. You cite as support, reductions in the area of five critical habitat types in the Proposed Action. You apparently used DEIS Table 39 to draw this conclusion. However, DEIS Table 39 shows that except for a slight increase of turkey, most habitat in Alternative F and the habitat factors you cited decline in all alternatives. Also, DEIS Table 39 cannot be used out of context with DEIS Table 40. DEIS tables 39 and 40 must be interpreted together to predict the overall effect on wildlife habitat of each alternative. The overall effects on wildlife habitat are shown in DEIS Table 41, which shows that wildlife habitat quantity and quality improve under the Proposed Action. This conclusion is supported by the wildlife recreation figures in DEIS Table 9 which shows that wildlife recreation increases under the Proposed Action. The modified Proposed Action Alternative shown in the final Environmental Impact Statement would have similar effects on wildlife and wildlife recreation.

You also stated that the Proposed Action does little to improve developed recreation on the Forest. However, the Proposed Action provides a moderate level of recreation development adding 3,200 PAOTs of developed recreation capacity. This level of development is second only to Alternative B. The developed recreation outputs shown in Table 9 reflect the increase in developed recreation under the Proposed Action.

1-28

As noted in earlier Forest Service responses, significant changes in timber harvest have been made for the revised Proposed Action. Timber sale values have been reduced and both the acres managed for timber production and the associated roading have been revised downward considerably. In addition, the revised timber program includes less than half of the original acres proposed for timber stand improvement investments. Reforestation investments remain at the original level. All of these factors have contributed to a substantial reduction in timber costs over the original program. It must be remembered that the timber program on the Gila is managed to produce other outputs and conditions on the ground, not just timber. Because there are joint costs and returns for the timber program, a comparison of timber benefits and costs alone may not yield an accurate relationship between all benefits and costs.

As a result of changes made in the Proposed Action timber program, there will also be no significant increase of mixed conifer harvest. This and other important changes are shown in the Proposed Action Changes Summary at the beginning of this document.

The FORPLAN model is used to provide the most cost effective method of meeting alternative objectives. This model contains information on all resources and, as a result, can consider the economic effects on all resources. If unroaded areas and low sites are not efficient areas to manage to meet objectives, they will not be allocated.

LETTER I

Grazing Benefits versus Costs

Proposed permitted grazing use is 33,200 AUMs per year, or over 10 percent, more than the estimated current capacity. In order to increase capacity, the Forest Service proposes to spend \$875,000 per year on range improvements. This expenditure is far greater than the grazing receipts for the AUMs created.

Alternative F in the EIS is the only alternative which proposes to reduce permitted grazing use to current capacity. Range management under this alternative is expected to cost \$529,000 per year or \$346,000 less than the preferred alternative. This \$346,000 is needed for the additional 33,200 AUMs which the preferred alternative will provide. The average cost per AUM is \$10.42 which is more than the Plan's estimated grazing value of \$7.88.

While the Plan proposes relatively large expenditures for timber and grazing projects, the proposed budget for recreation and wildlife is modest. An annual expenditure of \$743,000 is planned, including \$254,000 on developed recreation, \$112,000 on dispersed recreation, \$118,000 on wildlife recreation, and the remainder on fish and wildlife activities including habitat improvement. This expenditure will produce a return of \$10 to \$20 million, a benefit-cost ratio of at least 13 to one. The NRD realizes that the Forest Service is required to consider other objectives in addition to maximization of net benefits. However, with respect to timber and grazing, we do not feel the Forest Service has addressed the issue adequately.

FOREST SERVICE RESPONSE TO LETTER I

1-29

We disagree with the process that you used to make the determination that the average cost per AUM is more than the estimated grazing value. When calculated correctly, using both AUMs of added capacity and AUMs of existing capacity sustained through the maintenance of range improvements, the cost per AUM is actually less than the benefit value used in the Plan. These costs are greater than the grazing receipts, but grazing receipts do not represent the true benefit value. If receipts did represent the benefits, wildlife and dispersed recreation would not have been assigned a benefit value since they do not return dollars to the treasury.

In your comment you stated that Alternative F is the only alternative which proposes to reduce permitted grazing use to current capacity. You then use the costs in Alternative F compared to the Proposed Action costs to show that it costs \$346,000 to get 33,200 AUMs. This analysis is incorrect.

First, the additional AUMs of capacity in the Proposed Action Alternative is 35,200 not 33,200. Second, the \$529,000 per year range costs in Alternative F does not sustain the current capacity. In Alternative F the grazing capacity is actually projected to decrease over time to a sustained level of 284,585 by the fifth decade. This is because at the funding level in Alternative F, not all existing range improvements would be maintained. The first decade level is close to the existing capacity, but it is not correct to assume that this level could be sustained with the funding level in the Alternative. Lack of maintenance funding in the first decade sets up the decline projected in out decades.

When the Alternative F capacity decline is included in the analysis, we find that the additional \$346,000 in the Proposed Action Alternative not only results in increasing the existing capacity by 35,200 AUMs, it also sustains approximately 30,500 AUMs that would be lost at the funding level in Alternative F. This means that the 65,700 AUMs that are either added to the existing capacity or were sustained above the level in Alternative F are actually costing \$5.27 per AUM as compared to a benefit value of \$7.88, not the \$10.42 cost per AUM calculated by the NRD.

1-30

It is not accurate to single out individual costs called timber costs, recreation costs, etc. and assign single benefits to those costs. No single cost results in a single benefit. As an example, costs that are called timber costs are used to plan and administer timber sales. In the project planning phase of a timber sale integrated stand management techniques are used to insure that diversity of wildlife habitats is maintained or increased. The timber harvest activities open up some stands which provide for additional wildlife forage. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this activity, even though the activity benefits wildlife, are called timber funds. The same is true of range projects. As a result of this joint production situation, all costs must be considered in relation to all outputs.

You are correct that the Forest Service is required to consider other objectives in addition to maximization of net benefits. The National Forest Management Act regulations establish the planning process as an issue driven process. The purpose is to provide for multiple use and sustained yield of goods and services from the National Forest System in a way that maximizes long term net public benefits in an environmentally sound manner. We feel that the Plan, as amended as a result of public comments, best addresses issues and maximizes net public benefits.

LETTER 1

Fire Protection

Planners carefully estimated the relative costs of fire protection and emergency fire suppression in managed timber areas and in wilderness and unroaded timber areas. Fire protection was found to cost nearly eight times as much on acres in the suitable timber base as in wilderness. Emergency fire suppression was estimated to cost three to 25 times as much in developed timber areas as in unroaded timber and wilderness. Please expand your justification regarding these costs.

Insects and Disease

Major insects and disease problems on the Forest include dwarf mistletoe and spruce budworm. These pests may reduce tree growth but reduced growth should be compared to the costs of control. Spruce budworm, which attacks mainly the low-valued mixed conifer species, can probably be handled at least cost using Bacillus thuringiensis on severely infected stands. Dwarf mistletoe, which mainly attacks ponderosa pine, can be treated through normal silvicultural methods.

Timber Values

The best indication of timber values are recent bids made by purchasers of national forest timber. Since timber is sold through competitive auctions, these bids represent a close approximation of purchasers' willingness to pay for timber. Willingness to pay is the measure of value which should be used.

The Forest Service projected the bids ahead to 1983, the year the forest plans were expected to be completed. Values were adjusted for the Gila using local purchaser road credits, since purchasers were required to build roads as a part of many timber sales. Because of changes in regulations, the market conditions from 1982 to date better represent the conditions in the banking, housing, and timber industry which can be expected to prevail over the next decade or so. During this time period, timber prices on the Gila were significantly lower than the 1978-1982 period. US Forest Service predictions of timber prices between 1983 and 1992 are far higher than have so far been experienced. The predicted price for ponderosa is six times recent bids. The predicted price for mixed conifer--which planners assumed to be half Douglas fir and half ponderosa pine--is eight times the average of recent bids for Douglas fir.

FOREST SERVICE RESPONSE TO LETTER 1

1-31

In order to apply fire costs to resources that benefited most from fire protection and suppression, fire costs were distributed to areas containing the resources that could be damaged the most by fire. One of these resources is suitable timber. A higher percentage of the fire protection and suppression costs were, therefore, assigned to suitable timber areas. The costs were entered into these areas but this does not mean that the cost would be incurred in these areas. For example, aggressive suppression action may be taken to control a fire in grasslands if there is a high probability that the fire may spread to a suitable timber area. The cost of this fire suppression activity was included with the suitable timber because a high percent of the costs were incurred to protect the suitable timber.

Wilderness fire protection and suppression were generally higher than the fire costs in nonwilderness areas that are also not suitable timber. This is because of the additional cost incurred in fire activities in remote areas and the methods used to prevent and suppress fires in wilderness. These higher costs were based on past budget experience.

Fire costs in unroaded tentatively suitable timber were only lower in the "low" prescription. This is because in this prescription, these areas were not managed to sustain timber outputs and as a result were not considered suitable timber. These lower costs were also applied when an unroaded area was not needed to sustain the timber harvest level in a particular alternative.

Variation in fire costs between prescriptions resulted in variations in acres burned. Acres burned in suitable timber areas were translated into loss of timber outputs and reduction in some types of wildlife habitats. Acres burned in nonsuitable timber areas and in wilderness were translated into loss of some types of wildlife habitats. By tracking fire suppression and protection activities in this manner, areas with the combination of resources that received the greatest benefit incurred the highest costs.

1-32

We agree that the least cost method of insect and disease control that meets the management objectives of specific areas should be used.

LETTER I

and half ponderosa. If current prices continue for the next decade, then Forest Service estimates of timber benefits shown in table 11 of the EIS are six times too high. Rather than the \$5.6 million shown, the annual timber benefits of the preferred alternative are likely to be less than \$1 million.

The Forest Service also assumed that timber prices would increase over the next 40 years. Prices were expected to more than double by the fifth decade of the Plan (EIS page 218). These price predictions have major significance for the timber land base and proposed level of future timber harvests as well as the comparison of relative resource benefits. Revising timber prices would have a significant effect on the Forest Plan.

Grazing Values

Grazing values may also be too high. Grazing receipts have been declining in recent years, reflecting a steady decline in the net value of red meat. In 1985, receipts are only \$1.35 per AUM--equal to \$1.08 in fourth quarter 1980 dollars. Yet Forest Service planners assumed that these receipts are far less than actual fair market values for grazing, despite the fact that they are set by a Congressionally-mandated formula rather than competitive bidding.

Grazing values were based on data generated by the Economic Research Service (ERS) of the US Department of Agriculture. The Forest Service also assumed that grazing values would increase slightly over time (EIS page 218), which is contrary to recent trends. The ERS values are significantly higher than fair market values estimated in the draft 1985 Grazing Fee Review and Evaluation. This is a joint Forest Service-Bureau of Land Management study which was prepared to assist Congress in 1983 dollars of \$4.02 in fourth quarter 1980 dollars. This is 49 percent less than the value used by Gila planners. Ranchers in New Mexico have argued that \$4.00 per AUM is too high. Willingness to pay, net value rather than gross benefits, should be the estimate of value.

FOREST SERVICE RESPONSE TO LETTER I

1-33

You stated in your comment that timber benefit values should be based on competitively bid timber prices received from 1983 to the present. You stated that this period should be used because the benefit value derived by using bid data for this period better reflects expected conditions in the banking, housing, and timber industry for years to come. We feel that rather than using two low years to project future conditions that cannot be projected with any degree of accuracy, it is better to use the average of several low and several relatively high years. That is why the timber benefit value used in the Plan has been revised using data from 1978 to 1982.

The timber benefit values originally used in the Plan were calculated from time trend analysis of Regional sales data (1968-1979). This process yielded a benefit value of \$172.59/MBF for Ponderosa pine and \$142.99/MBF for mixed conifer. These benefit values were projected to increase over time. The revised benefit values are based on average Forest selling prices from 1978 to 1982. This span of years includes three years when prices were low and two years when prices were higher. The result is a revised benefit value of \$104.81/MBF for Ponderosa pine and \$86.35/MBF for mixed conifer. These benefit values include \$40.00 purchaser credit. They are projected to stay constant over time.

The average purchaser credit value is included in the benefit value so that the specific purchaser costs can be subtracted for individual analysis areas. This gives the model economic selectivity between areas variations in road costs.

Alternatives have been adjusted to reflect these revised benefit values.

1-34

We disagree that the benefit value for domestic livestock grazing needs to be changed. The benefit value used in the Plan is considered to be sufficiently accurate to use for Forest level allocations and to determine the economic tradeoffs between competing resources. As can be seen by reviewing the maximum PINV Benchmark, with the benefit value used, range does not compete well economically with other resources that use forage (primarily wildlife). As a result, the level of domestic livestock allocation in the Proposed Action Alternative is not a result of the range benefit value but a result of an attempt to resolve issues and improve range management on the Forest in an implementable way.

Since the creation of the National Forest System, significant progress has been made in improving the productivity of rangelands on the Forest. This progress has resulted from improved management by the Forest Service and Forest grazing permittees and has been especially evident in the past decade. In 1975 only 74 grazing allotments out of 152 (49 percent) were under satisfactory management. By 1985, 96 allotments out of 141 (68 percent) were under satisfactory management. Forestwide, range condition and trend has also improved.

The 350,000 animal unit month level projected for the Proposed Action Alternative will result in continued improvement in range management on the Forest while providing for other Forest resources that require forage. This level was established as a management objective (constrained level) and did not result from the range benefit value. This level would maintain approximately 90 percent of the 383,000 animal unit months of permitted domestic livestock grazing while improving environmental quality. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. As a result, even this level of projected adjustment could result in hardship on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonably expected funding. The Proposed Action Alternative is the most successful at improving the condition of the range resource on the Forest.

Recreation Values

Recreation values used in the Gila Plan were based on data from the 1980 RPA Program. However, these values have been significantly increased by the 1985 RPA Program. Moreover, revising the grazing fee formula. According to this review, grazing values in the Gila Forest are only about \$4.88 per AUM values developed for the 1985 Program were reduced by 37-1/2 percent. The initial recreation values of the 1985 RPA Program are approximately double those in the Gila Plan. By this estimate, the total recreation benefits provided by the Forest are over \$20 million.

35

Pricing Summary

It appears that the Forest Service has used forecasts which increase the value of timber and grazing in the face of decreasing willingness to pay. At the same time, the values for recreation which have been chosen appear low. Because the models attempt to maximize benefits, prices skewed in this way will drive the model to the wrong conclusions, even if it is carefully constrained. The models should be rerun with more appropriate values.

36

Budget for the Gila Forest Plan and Alternatives

While the range of alternative land allocations is narrow, the range of alternative budgetary allocations is wide. The annual budget over the next ten years varies greatly among alternatives, particularly for recreation and grazing. As would be expected, recreation and fish and wildlife budgets are greatest in the amenity alternative and least in the commodity alternative. Similarly, the grazing budget is least in the amenity alternative and greatest in the commodity alternative. However, the timber budget is greatest in the preferred alternative. This is evident when reforestation and timber stand improvement costs are considered and implies that most of the timber budget is based on long term investment in fiber production and stand health.

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1-35

Nonwildlife dispersed recreation output allocations are not a result of benefit values. Nonwildlife dispersed recreation is met in every alternative (+10 percent). The only thing that changes between alternatives is the quality of the recreation experience and the types of recreation opportunities available. These are non-priced benefits that do not effect the dollar benefit values. As a result of these factors, the economic model tries to close the recreation prescription with the least cost. An increase in the benefit value would not change this situation. Constraints must be used if the nonpriced values of higher experience levels of certain types of opportunities are to be achieved. Increasing the benefit value would change the PNW of the Alternatives but it would not change the allocation. The existing benefit value is sufficiently accurate to reflect the relative economic tradeoffs between alternatives.

The weighted average wildlife recreation benefit value from the 1985 RPA is not significantly different than the value used in the Plan.

The objective of developed recreation on the Forest is to provide a type of recreation opportunity in a forest environment or near public lakes that is not normally provided by the private sector. These opportunities are limited.

For the same reasons described for dispersed recreation, the emphasis level on developed recreation within existing campgrounds would not change as a result of increasing the benefit value. The amount of recreation visitor days that can occur in these areas is limited by the number of campsites. An increase in emphasis in these areas results in higher maintenance levels and service levels but does not increase the recreation opportunities. Only the non-priced experience level changes. Since numbers of users change little until the maintenance level is so low that the campground has to be closed, the economic model will choose the lowest cost alternative that keeps it open. Changing the benefit value would not change this situation.

Since long term projected demand for developed recreation is higher than supply, increasing the benefit value could have resulted in the model choosing an option that resulted in the construction of additional facilities. On the Proposed Action Alternative we forced the model to choose the option that did this. The chosen prescription provided for the maintenance of existing facilities and the construction of the Quemado Lake Campground. Changing the benefit value would, therefore, have resulted in a higher PNW for the Proposed Action Alternative but it would not have resulted in a change in the allocation.

1-36

As explained above, the benefit value for timber has been revised. The Proposed Action Alternative has been rerun with this new benefit value and with other changes to reflect the concerns expressed by commentators.

1-37

In this comment, you explain that the wildlife budget is the greatest in the amenity alternative, the grazing budget is least in the amenity alternative, etc. They seem to think that this is logical but they seem to be surprised that the timber costs are high in the original Proposed Action Alternative. Since the original Proposed Action Alternative produced the second highest level of long term timber outputs, it does not seem surprising that it would have one of the highest timber budgets.

As explained in our response to comment 31, however, it is not correct to single out a single cost and attach a single output to that cost. You suggest that cost data implies that most of the timber budget is based on long term investment in fiber production and stand health. You reached this

LETTER I

FOREST SERVICE RESPONSE TO LETTER I

The amenity alternative spends almost \$750,000 per year more on wildlife than the preferred alternative. This is partly responsible for an additional estimated 105,000 wildlife-recreation visitor days per year in the first ten years. At an average value of \$21 per day, this has a total value of \$2.2 million. Wildlife recreation also produces an estimated 5 jobs for every 10,000 visitor days, so the amenity alternative produces 52.5 jobs more than the preferred alternative.

While this would seem to be a worthwhile investment, it is difficult to determine how much is due to the added costs and how much is simply due to smaller timber and grazing outputs.

It is unlikely that funds for the wildlife activities contemplated by the amenity alternative will be available. To determine the effects of the added costs the FORPLAN model should be allowed to maximize net benefits within an achievable budget.

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conclusion by stating that the timber budget is the highest under the Proposed Action Alternative and then inferring that reforestation and timber stand improvement costs are higher. The conclusion seems to be that since the timber stand improvement costs are higher, the higher overall timber budget must be primarily a result of long term fiber production.

It is true that the first decade reforestation and timber stand improvement costs were higher in the original Proposed Action Alternative than in Alternative D [the alternative that produces the highest timber outputs]. If, however, most of the budget is based on long term investment in fiber production and stand health as you suggest, then why did the Proposed Action Alternative result in lower outputs for higher costs? The higher costs were actually a result of logging less volume per acre because of nontimber considerations [wildlife, visual quality, etc.]. There are, therefore, more acres that need to be regenerated and more acres on which to do timber stand improvement. Other "timber" costs were also increased to provide for more detailed timber sale preparation and administration required to allow other multiple use objectives be met in the timber sale areas.

Even though we felt that it is important to explain the reason for the timber cost situation that existed on the original Proposed Action Alternative, it is also important to state that the situation no longer exists on the modified Proposed Action Alternative. Because of public concern with the level of harvest in the original Proposed Action Alternative, the harvest level has been reduced. Because of this reduction in timber outputs, and the subsequent reduction in the portion of timber costs directly associated with timber outputs, the Proposed Action Alternative no longer has the highest timber costs.

1-38

We disagree that the amenity alternative produces 52.5 jobs more than the Proposed Action Alternative. The amenity alternative may produce 52.5 more jobs in recreation related sectors of the economy, but this is offset by a reduction of jobs in the other sectors of the economy. Total employment is actually projected to decrease by 34 jobs if Alternative F was implemented. (DEIS page 128)

1-39

The wildlife outputs in Alternative F are due to both increased wildlife costs and smaller timber and grazing outputs. The level of wildlife achieved in Alternative F cannot be achieved without both of these things.

For example, the reduced grazing outputs result in additional forage for wildlife, but the level of wildlife projected in Alternative F would not materialize if water developments and some other developments are not maintained. The portion of these developments that were needed by domestic livestock but are now needed by wildlife are maintained by wildlife. In addition, new wildlife improvements are needed.

Reductions in timber outputs also result in reductions in the budgets needed to provide these outputs. Since all alternatives have a budget constraint, it would not be possible to provide the needed wildlife budget unless budgets in some functional area were reduced.

We disagree that the budget contemplated by the amenity alternative is not realistic. Proposed budgets for all of the alternatives are feasible. That is why we used a budget constraint in all alternatives and did not propose alternatives with budgets substantially higher than the budgets we were receiving in 1980. As a result, we can see no need to formulate the FORPLAN run that you recommend.

LETTER 1

FOREST SERVICE RESPONSE TO LETTER 1

Additional Problems

The Forest Service used an early version of RMYLD. More recent versions allow users to account for limited stocking capacity. Other programs, such as ECOSIM, may also account for stocking capacity problems if they are properly calibrated. Such calibration could be done by applying ECOSIM to older inventory data and comparing the results with recent growth as evidenced by the latest inventory data. Please indicate what effect limited stocking capability will have on the yield tables. One aspect of Gila yield tables about which NRD has a question is the projection that volumes will increase by two thirds or more with repeated thinnings. Please indicate what research justifies the assumption of a two thirds increase with repeated thinnings.

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The best available growth simulation model was used to develop timber yield information for the Gila National Forest. A number of different models were evaluated and compared. In 1981, when timber yield estimates for the Forest Plan were made, the following growth simulation models were evaluated: Rocky Mountain Timber Yield (RMYLD); STMES (ECOSYM); Ponderosa Pine Model (PIPO), PROGNDOSIS, and hand calculations. ECOSIM and PIPO were unpublished and not yet approved for use. PROGNDOSIS was not based on southwestern data. A revised version of RMYLD (RMYLD II) had not been developed at that time. After consideration of the relative advantages and disadvantages of each, RMYLD was selected as the best available model for use by the Gila National Forest.

The RMYLD Model was the best growth model available when the Gila timber yield tables and FORPLAN model were developed and were also based on Southwestern data. Growth, dwarf mistletoe, site index, and stocking data used in the RMYLD model were from plots located throughout Ponderosa pine forests of Arizona and New Mexico (including data from the Apache National Forest, part of which is included in the Gila Administrative Unit). The data used in RMYLD is described in Research Paper RM-87. The evaluation and use of RMYLD on the Gila is described in the Timber Analysis Technical Report, Gila National Forest, which is available at the Gila National Forest Supervisor's Office.

You expressed concern with the effects of stocking on the yield tables and questions the projected volumes that result from repeated thinnings.

We feel that since some of the data for RMYLD calibration came from a proclaimed National Forest that is not part of the Gila Administrative Unit, stocking data within the model is adequate for projecting growth and yield on the Forest. The adequacy of the stocking control is substantiated by test run on other Forests in the Region. (Described later in this discussion)

In considering the projection of growth, it must be recognized that any yield model provides only an estimate. The question that must be addressed is whether or not the model results are reasonable. One way to verify if yields are reasonable is to compare the actual growth from inventory data to the growth and yield projections in RMYLD. The actual growth recorded in the last timber inventory for the Forest was 75.09 cubic feet per acre per year. The average yield for the Proposed Action Alternative displayed in the draft Environmental Impact Statement was 41 cubic feet per acre per year. The inventory yield is in incremental yield and not average yield, but it does indicate that the yields used in the Plan are reasonable and may even be conservative.

In your comment you also suggest that the RMYLD data should be calibrated using ECOSIM. In doing so, they are suggesting the ECOSIM may be more appropriate for planning than RMYLD. Before ECOSIM was approved for use on Region 3 Forests, comparison tests were made on the Coconino National Forest which showed there was no significant difference between yields estimated with ECOSIM and yields estimated with RMYLD. Also, the Carson National

Forest developed FORPLAN models using both simulators. The early model used timber yields developed using an early version of RMYLD and the more recent model used timber yield estimated using ECOSIM. The Maximize Timber Benchmarks from both models gave nearly identical results, clearly supporting the notion that both growth models give similar estimates of timber potential.

As a result of the facts presented above, we feel that the estimated yields provided by RMYLD are reasonable and there is no need to verify them through use of a model that has been proven to provide similar information.

LETTER I

Monitoring

A monitoring element should be developed that compares water quality, wildlife numbers, and other environmental indicators with commodity production. For example, if water quality in an area declines beyond a predetermined level due to timber harvests or grazing, steps should automatically be taken to reduce the decline through reduced commodity production or increased funding for soil and water improvements. Also, it was noted that the Timber 1 element does not indicate the time for reporting which we would propose as an annual basis.

Conclusions

Planners should develop and consider an alternative, similar to the amenity alternative, that produces substantially lower timber and livestock grazing outputs but provides high recreation and wildlife opportunities without major new investments. This would show how much wildlife recreation depends on habitat improvements and how much is simply a result of reduced conflicts between wildlife and commodity use. The new alternative should also drop expenditures which may have a low marginal value such as grazing and timber enhancement. Timber harvests in the new alternative may have greater value if the alternative were to eliminate lands from the timber base if they are expensive to harvest.

Individual areas of the forest should be modeled so as to allow maximization of benefits from each area. This means cross subsidization or non-contiguous harvest areas would be explicitly recognized and could be justified.

FOREST SERVICE RESPONSE TO LETTER I

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The monitoring plan already includes activities to monitor several appropriate environmental indicators. If the monitoring of these environmental factors indicates that the levels projected in the Plan are not being met, appropriate action will be taken to correct the situation.

1-42

As explained in response to comment #40 and as can be seen by looking at the Current Alternative, the situation you suggest is not real. Several of the wildlife species on the Forest are dependent on improvements that have been constructed for domestic livestock (especially waters). When these improvements decline because of lack of maintenance, wildlife numbers dependent on these waters also decline. The species that decline are primarily those that provide a high percentage of the wildlife related recreation. As a result of the analysis done for alternatives like Current (Alternative A), we can see no need to develop the alternative you suggest.

Analysis area and prescription combinations were designed to give the model the selectivity of high and low cost areas. As an example, if it is more costly to log cable areas and the benefits are not commensurate to the costs, the model can choose an option that does not log cable. If all costs resulting from timber harvest are higher than the benefits, the model can choose an option that does not log. Since these choices are available to all alternatives, the addition of another alternative would not provide new information.

1-43

We agree that individual areas of the Forest should be modeled so as to allow maximization of benefits from each area and we feel that we accomplished this goal. Two hundred and twenty-six individual analysis areas were included in the Forest planning model. Of these, 108 were to analyze the benefits and costs of various management options on suitable timber areas on the Forest. These 108 analysis areas were specially located so that costs associated with timber activities (haul costs, road costs, etc.) could more accurately be analyzed. Road costs were specifically addressed for each of these individual areas. Areas were stratified into those that were generally unroaded and those that were roaded. By doing so, the model could allocate unroaded areas to nontimber options if such an allocation was appropriate. Since timbered analysis areas included both steep and non-steep areas, prescriptions were developed that provided for logging only non-steep portions.

Prescriptions were not developed that provided for logging only ponderosa pine, but the effects of these were considered. On the Gila the average mixed conifer stand is 50 percent ponderosa pine so the benefit values differences are not as great as if they were 100 percent douglas fir or true fir. They also generally have higher volumes per acre than the ponderosa pine stands. As a result, the differences in benefits and costs were not significant enough to warrant generation of prescriptions that only logged Ponderosa pine.

We feel that the contiguous analysis areas defined and the prescriptions developed result in the planning model that better provided for the maximization of benefits from each area than if non-contiguous harvest areas had been included in the model. Costs and other tradeoffs could be more specifically tracked and less cost averaging was needed.

LETTER I

[The final Plan and EIS should include a wide range of land uses, including non-timber uses or roadless areas.] [At least one alternative should include a constraint to low value or high cost timber in the timber base] [Alternatives should have variations in the number of acres allocated to livestock grazing] [One alternative should include lands in the timber and livestock grazing base only if it can be shown that the benefits of including those lands are greater than the costs] [Finally the budget should be allowed to vary in order to maximize net benefits within a budget which the Forest Service is likely to be able to obtain]

FOREST SERVICE RESPONSE TO LETTER I

1-4A

Forest Alternatives were developed to provide for a wide range of allocations. A prescription was developed for every suitable timber analysis area that provided the model with the option of not logging the area. The model then allocated the combination of outputs and costs to each area that best met the objectives of the Alternative. Areas that are presently unroaded were allocated to various options on the various alternatives. A table has been added to show the alternative effects on unroaded areas. The Proposed Action Alternative was also modified to better address the concern that some unroaded areas remain unroaded.

1-45

As explained above, a prescription was included in every suitable area that would allow the model to choose a non-harvest option if that option was appropriate to meet the objectives of the alternative. As a result, low value or high cost timber areas would not be allocated to timber production if they were not needed to meet the objectives. We are not sure from your comment what the objective of a constraint on low value or high cost timber would be. We can only assume that the objective would be to provide cost efficiency in managing these areas. That objective has been met in all of the alternatives.

The results of managing with a single objective of maximizing present net value is analyzed in the Maximum PNW Benchmark. This Benchmark does not allocate any timber harvest in areas that are not cost effective and seems to address the concern you expressed. Alternative F, E, and C also do not contain a timber objective and as a result only allocate to areas where costs are lower than the overall benefits of prescriptions that include timber activities. Constraints are not necessary to accomplish this analysis.

1-46

Indirectly, the alternatives do contain variations in the number of acres allocated to livestock grazing. In the Current Alternative (Alternative A) for example, the deterioration of facilities over time will result in some parts of the Forest receiving little or no use. It is not possible to predict where these areas would be or how soon the use would decline on individual areas. As a result, there was no attempt to say that these areas would not be allocated to grazing.

Allocation of whole allotments to nongrazing options is not considered necessary. Domestic livestock grazing is a legitimate use of the National Forests. Unless grazing needs to be eliminated to meet some other specific multiple use objective, the elimination is not considered appropriate. You have not indicated any multiple use objective that would result in the need to include nongrazing alternatives.

1-47

All of the alternatives that do not include timber constraints (Alternative C, E, and F) include timber lands where the benefits of prescriptions that harvest timber are greater than the costs. If benefits did not exceed costs, the model would have chosen an option that did not harvest timber.

As can be seen from the numbers included in your comment #30, even the Proposed Action Alternative provides benefits that are higher than costs. You indicated that the grazing costs in that alternative are \$675,000 [\$529,000 in Alt. F plus \$346,000]. This cost results in sustaining 350,000 AUMS. This is a cost per AUM of \$2.50. This is far less than the benefit value used in the Plan and is even less than the benefit value suggested in your comment #35.

LETTER 1

The preferred alternative includes programs which are inefficient or difficult to justify on the basis of net public benefits. The Forest Service should make substantive revisions to the EIS and Forest Plan to correct this problem. Values for timber, grazing, and recreation should be revised. Timber yield tables should be carefully reexamined. A wider range of alternatives should include various land allocations. Having reviewed three forest plans in detail the Department believes that the primary problem may be the use of FORPLAN. This model is too complex and its constraints are hidden to the general public.

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FOREST SERVICE RESPONSE TO LETTER 1

1-48

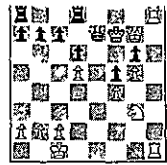
We disagree that the budget used in the Plan is not attainable. Budgets received by the Forest Service have always gone up and down. The present budget is only approximately 15 percent below the budget constraint level used for the Alternatives. There is no reason to believe that the Plan level cannot be met at on the average during the 10 year planning period.

1-49

We have discussed the concerns in this portion of your response with the various comments above.

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The National Forest Management act requires that each alternative be formulated in such a manner that the objectives of the alternative be met in the most cost effective way. With the number of variables to consider, we do not know of a better tool to accomplish this than the use of a linear programming model like FORPLAN. We agree that the modeling process is complex, but so are the management problems that we are addressing with the model. FORPLAN is an appropriate planning tool.



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(503) 686-CHEC 12 September 1985

Review of the Draft Gila Forest Plan and EIS

The Gila National Forest located in southern New Mexico, published its draft Forest Plan and environmental impact statement (EIS) in June, 1985. Asked by the State of New Mexico to review the Plan, CHEC staff members visited the Gila National Forest offices in late August.

CHEC reviewed FORPLAN runs, IMPLAN runs, RMYLD runs, technical reports, the analysis of the management situation, and other background data and information. CHEC also reviewed the Draft Plan and EIS documents. This report is based on those reviews.

Computers played a major role in developing the Forest Plan. FORPLAN is a computer program used to assist planners in allocating land and scheduling timber harvests. IMPLAN is a program used to project the social effects of alternatives. RMYLD is a program used to project future timber yields. Results from each of these programs are discussed in this report.

The Economics of Gila Forest Management

The Forest Service has a responsibility to manage a number of resources, including recreation, timber, water quality and quantity, wildlife, and forage for domestic animals. From an economic view, however, only three — timber, grazing, and recreation — need be considered in great detail on the Gila Forest.

Water is of minimal importance because so little is produced by the Gila and it is not significantly affected by management activities (EIS page 46). Fish and wildlife are important, but their values are related to the amount of recreation they generate, and thus are included in overall recreation values.

Table 11 of the Gila EIS (page 49) indicates that of the three major resources, recreation has by far the greatest value. In the preferred alternative, recreation (including wilderness recreation) is expected to provide over \$10 million worth of benefits each year for the next ten years. By comparison, timber and grazing together are expected to produce less than \$8.3 million worth of benefits. These and all other values mentioned in this report are in fourth quarter 1980 dollars unless otherwise noted.

Yet the grazing and particularly the timber values are far higher than realistic. As shown on page 218 of the EIS, planners assumed that ponderosa pine is worth about \$172 per thousand board feet while mixed conifer stands are worth about \$143 per thousand. Grazing is assumed to be worth nearly \$8 per AUM while most developed and dispersed recreation is assumed to be worth \$3.80 a visitor day. More recent information indicates that these timber and grazing values are high while the recreation values are, if anything, too low.

Publishers of Forest Planning

LETTER I-CHEC

Timber Values The best indication of timber values are recent bids made by purchasers of national forest timber. Since timber is sold through competitive auctions, these bids represent a close approximation of purchaser's willingness to pay for timber.

The timber values used in the Gila Plan were based on the average high bids, minus purchaser road credits for Arizona and New Mexico Forests as a whole over the period 1968 to 1979. High bids increased significantly during this period, and planners expected this increase to continue.

So planners projected the bids ahead to 1983, the year the forest plans were expected to be completed. Values were adjusted for the Gila using local purchaser road credits since purchasers were required to build roads as a part of many timber sales.

In reality, the high prices bid during the late 1970s were the result of a housing boom which was based largely on artificial demand generated for housing by Federal subsidies and regulation of the banking industry. In 1980 the banking industry was deregulated and many of the subsidies ended. This raised mortgage interest rates, significantly increasing the cost of housing. Potential homebuyers responded by favoring multifamily dwellings, home reconstruction instead of new construction and other alternatives to new single-family housing.

In addition, forests in the southeastern United States, which had been depleted several decades ago, were growing to merchantable size. The southern timber industry has been able to make significant inroads into markets traditionally held by western producers. This has further reduced the value of western timber even as the housing industry is having a minor resurgence.

As a result, New Mexico timber values have fallen drastically since 1979 rather than increased as projected by planners. This has been partially recognized by Region 3 planners, who have directed certain forests to use revised values based on the average prices bid between 1978 and 1982. On the Lincoln National Forest, for example, this reduced timber values by two-thirds.

Even this may be an overestimate, however. According to Buddy Stewart, an economist in the Regional Office, the 1978 to 1982 period was selected because it was the period used by Adams and Haynes for average prices from which to make future price projections.

Yet there is no indication that the average prices bid between 1978 and 1982 represent a good estimate of prices in the near future. As late as 1981, when Douglas-fir in one timber sale sold for nearly \$1800 per thousand board feet, timber purchasers were anticipating continued high markets.

The market conditions from 1982 to date better represent the conditions in the banking, housing, and timber industry which can be expected to prevail over the next decade or so. During this time period, timber prices on the Gila were significantly lower than during the 1978-1982 period.

Between 1978 and 1982, Gila timber sold for an average of \$128 per thousand board feet including purchaser credits. Included in this average are two very high bids for Douglas-fir, one over \$300 per thousand and one nearly \$1800 per thousand. According to planners, these resulted from a "bidding war" between two buyers and do not fairly represent the true value of Gila timber.

Eliminating these two bids, the average bid for timber during 1978-82 was \$92 per thousand. The ponderosa pine sold for an average of \$95 per thousand, while other species -- mainly Douglas-fir -- sold for an average of \$35 per thousand. (When the two high bids are included, the other species sold for an average of \$451 per thousand.)

After 1981, however, prices fell dramatically. The average bid for ponderosa pine has been only \$28 per thousand board feet. The average bid for other species has been only \$6 per thousand. Since most timber sold in ponderosa pine, the average of all species has been \$28 per thousand.

Thus planners' predictions of timber prices between 1983 and 1992 are far higher than have so far been experienced. The predicted price for ponderosa is six times recent bids. The predicted price for mixed conifer -- which planners assumed to be half Douglas-fir and half ponderosa pine -- is eight times the average of recent bids for Douglas-fir and ponderosa.

FOREST SERVICE RESPONSE TO LETTER I-CHEC

CHEC-1

We agree that the benefit values used for timber in the draft environmental impact statement were too high and that there is no reason to increase the values over time. The benefit values originally used in the Plan were calculated from time trend analysis of Regional sales data for 1968 through 1978. This process yielded a benefit value of \$171.58/MBF for ponderosa pine and \$142.99/MBF for mixed conifer. As you stated, these benefit values were projected to increase over time. We have revised these benefit values based on average Forest selling prices from 1978 to 1982. This span of years includes three years when prices were low and two years when prices were higher. The result is a revised benefit value of 104.81/MBF for ponderosa pine and 86.35/MBF for mixed conifer. These benefit values include \$40.00 purchaser credit. They are projected to stay constant over time.

Alternatives have been adjusted to reflect these revised benefit values. The new values result in significant reductions in the number of acres managed for timber production in the revised Proposed Action. As a result, only 8 percent of the entire Forest will be managed for timber production (272,000 acres out of 3.3 million acres). The original Proposed Action called for timber management on 432,000 acres. Other important changes are shown in the Proposed Action Alternative Summary of Changes located in the front of this document.

In your comment you state that "even this [benefit value] may be an overestimate", and that "there is no indication that the average prices bid between 1978 and 1982 represent a good estimate of prices in the future". You infer that timber benefits should be developed from only the most recent years information. Most of the bids during this period were very low. You state that there is every expectation that the current low prices will continue for the next decade.

To use prices from only the very low market years, as you suggest would simply be moving to the opposite extreme and would be equally inappropriate as the use of only high years. Historically, timber prices have been highly variable and reflect the "boom and bust" cycles associated with the nation's general economic health. It should be noted that the declining prices of the early 1980's are not unique to the Gila National Forest. Prices nationwide have declined as well. This reflects the fact that Gila market conditions (and most other Forests throughout New Mexico and Arizona) react strongly to outside factors such as the general state of the U.S. economy. A good example of the price variability of timber is the fact that the price index for finished wood products has risen sharply over the past 9 months. This index is a leading indicator for expected stumpage prices from the National Forest. As of late April, 1986, this index had risen once again to the same level as the 1979 market high. The revised benefit values are based on 2 good market years (1978, 1979) and 3 years of sharply declining prices (1980, 1981, 1982). We believe this is a fair representation for future expectations since it is an average of both good market years and poor ones.

LETTER I-CHEC

If current prices continue for the next decade -- and there is every expectation that they will -- then planners estimates of timber benefits shown in table 11 of the EIS are at least six times too high. Rather than the \$5.6 million shown, the annual timber benefits of the preferred alternative are likely to be less than \$1 million.

In fact, timber receipts in 1984, including K-V (reforestation) deposits and purchaser road credits, totalled to \$1.65 million in 1984 dollars. Converted to fourth quarter 1980 dollars, this is about \$871,000.

Planners also assumed that timber prices would dramatically increase over the next 40 years. Prices were expected to more than double by the fifth decade of the Plan (EIS page 218).

This prediction was based on data from the 1980 RPA Program -- the Forest Service's comprehensive national plan which is revised every five years. Future timber price predictions were significantly revised downward by the 1985 RPA Program, and many economists consider the 1985 predictions to still be too high.

As this report will show, these price predictions have major significance for the timber land base and proposed level of future timber harvests as well as the comparison of relative resource benefits. Revising timber prices would have an enormous effect on the Forest Plan.

Grazing Values Grazing values may also be too high. Grazing receipts have been declining in recent years, reflecting a steady decline in the net value of red meat. In 1985, receipts are only \$1.35 per AUM -- equal to \$1.08 in fourth quarter 1980 dollars. Yet planners assumed that these receipts, which are set by a Congressionally-mandated formula rather than competitive bidding, are far less than actual fair market values for grazing. Grazing values were based on data generated by the Economic Research Service (ERS) of the U.S. Department of Agriculture. Planners also assumed that grazing values would increase slightly over time (EIS page 218), which is contrary to recent trends.

The ERS values are significantly higher than fair market values estimated in the draft 1985 Grazing Fee Review and Evaluation. This is a joint Forest Service-Bureau of Land Management study which was prepared to assist Congress in revising the grazing fee formula. According to this review, grazing values in the Gila Forest are only about \$4.88 per AUM in 1983 dollars or \$4.02 in fourth quarter 1980 dollars. This is 49 percent less than the value used by Gila planners.

Economists in the Regional Office indicate that they believe the ERS values to be more accurate than the Grazing Fee Review values. However, the Forest Service Director of Planning, Everett Towle, says that the ERS values were used as interim values until the Grazing Fee Review was completed. The newer values are to be incorporated into plans "as soon as possible" (personal communication 1985).

The Grazing Fee Review is essentially telling Congress that the fair market value for grazing is about four times the current fee. Yet the ERS data indicates that the market value is over seven times the current fee. Regardless of which information is more accurate, the Forest Service has a responsibility to use consistent data.

If the Grazing Fee Review is more accurate, then grazing values shown on page 49 of the EIS must be reduced by 49 percent. This would make the benefits of the preferred alternative only \$1.39 million.

FOREST SERVICE RESPONSE TO LETTER I-CHEC

CHEC-2

In your comment you claim that the grazing benefit values are too high. You stated that, the values used by the Gila N.F. are significantly higher than the "fair market values" estimated on the 1985 Grazing Fee Review and Evaluation and that the lower values should be used.

The grazing benefit value used by the Gila N.F. (\$7.88/AUM) was estimated by the USDA Economics Research Service (ERS) specifically for the Gila National Forest, using data collected from Gila permittees and reflects actual conditions observed in the area. The value derived from the 1985 Grazing Fee Review (\$5.63/AUM) is based on average lease rates negotiated for grazing on private lands. The value you suggest is an average for private land over a large geographic area extending from the Canadian border

southward to near the Mexican border and covers about one-third of the western United States. The area includes one-half of Colorado, almost all of the State of Wyoming, the entire State of Montana, the western one-third of North Dakota, part of Idaho, all of Arizona, the western one-third of Utah, almost all of the State of Nevada, and the eastern one-third of California. We believe that an average value over this large, very diverse geographic and marketing region based on private land leases does not represent a useful estimate of local conditions on the Gila National Forest.

In addition, the ERS value estimates used by the Gila consider both the season of use and the length of grazing seasons. The 1985 Draft Review estimates do not account for these differences between areas. This means that other feed requirements, sources, feed amounts, and cost differences from place to place are not reflected in the 1985 Draft Review estimates.

The ERS benefit values include considerations for ranch size, herd size, and herd mix. The 1985 Draft Review study does not. The ERS values include considerations for quality of range such as the carrying capacity and stocking rate. They also include adjustments for range improvements such as availability and distribution of water. The values estimated for the 1985 Draft Review study do not differentiate for any of these factors.

In previous comments concerning timber benefit values, you stated that the region-wide estimates for timber values were inappropriate for the Gila [region-wide timber values are significantly higher than for the Gila alone]. We agreed with this criticism and revised the timber values downward based on data specific to the Gila National Forest. In the case of grazing values, however, you indicate that regional values (which are lower than those estimated specifically for the Gila) should be used. We do not agree with the your logic.

In summary, we believe the grazing values developed specifically for the Gila National Forest, based on data from Gila permittees, are the most realistic values for use in forest planning. This approach uses the best available data for the Gila National Forest.

CHEC-3

Recreation Values Recreation values used in the Gila Plan were based on data from the 1980 RPA Program. However, these values have been significantly increased by the 1985 RPA Program. Values for dispersed and developed recreation were significantly increased.

Moreover, values developed for the 1985 Program were arbitrarily reduced by 37-1/2 percent. The explanation for this reduction, on pages F-11 and F-12 of the draft Program, is nonsensical. As described in CHEC's Review of the 1985 RPA Program, the reduction appears to have been politically motivated.

The unreduced values are shown in table F 4 of the draft RPA Program. The Gila Forest Plan values dispersed and developed recreation -- including camping, picnicking, hiking, and motorized travel -- at \$3.90 per visitor day, table F 4 values them at about \$10 to \$14 per day. Wildlife-oriented recreation is valued by the Gila Plan at \$21.60 per day but table F 4 values it at about \$18 to \$43 per day depending on the type. Wilderness recreation, valued by the Gila Plan at about \$10.14 per day is about \$19.58 in table F 4.

On the average, then, recreation values in table F 4 of the 1985 RPA Program are about double those in the Gila Plan. The total recreation benefits provided by the Forest then, are over \$20 million dollars. By comparison, the total grazing and timber benefits as adjusted above come to little more than \$2 million. Recreation produces ten times the value of grazing and timber.

The Forest Service's View of Demand. A fundamental problem with the economic analyses which went into the Gila Plan, and which is partly responsible for the errors in timber and grazing values, is the Forest Service's misuse of the concept of demand. This is repeatedly seen in the EIS and in background documents prepared for the Plan.

Demand is accurately defined in Forest Service planning rules as a price-quantity relationship. At higher prices, consumers will demand less of a good, while at lower prices consumers will demand more. While the rules require planners to use demand in this sense, planners instead equate demand with the use of a good at current prices.

For example, a document prepared by Gila planners called the "analysis of the management situation (AMS)" has this to say about demand for domestic grazing:

Demand for livestock grazing currently exceeds the production capability of the Gila National Forest. This is verified by the fact that permitted use on the Forest currently exceeds current capacity. The only way this current demand can be satisfied is with a large expenditure on new improvements and maintenance of existing improvements. As a result of this situation, Forest personnel felt that nothing would be gained by trying to project future use trends.

On the same subject, the EIS simply says "It is assumed that the demand for permitted use will be sufficient to match capacity in any alternative" (page 71). In each case, planners are either assuming that ranchers are completely insensitive to price -- which is highly unlikely -- or that current grazing fees will remain constant.

At a high enough grazing fee, the quantity of forage demanded for livestock grazing would be certain to fall below current capacity. Given that users are sensitive to prices, the statement in the AMS only makes sense if planners equate "demand" with use at current prices." Then the statement would read:

Livestock grazing use at current fees exceeds current capacity as verified by the fact that current use exceeds capacity. Therefore there is no reason to estimate future use.

Of course, read this way there is a strong reason to estimate future use: future fees may not remain the same as current. An increase in fees may lead to a decrease in use. Planners made no attempt to estimate this.

Similar problems exist for timber. The AMS says, "The long term demand for lumber and paper products is expected to increase. Economic conditions of the last few years have softened the demand, but are expected to reverse as the recovery continues and the economy strengthens. Since little pulpwood has been removed from the Forest and projected use would be highly speculative, no future use trends have been plotted. This product has, however, been valued in the model [at \$17.20 per thousand board feet]."

Three types of recreation benefit values must be considered in this discussion, non-wildlife dispersed recreation, wildlife recreation, and developed recreation.

Nonwildlife dispersed recreation output allocations (including wilderness) are not a result of benefit values. Nonwildlife dispersed recreation is met in every alternative (+/-10 percent). The only thing that changes between alternatives is the quality of the recreation experience and the types of recreation opportunities available. These are non-priced benefits that do not affect the dollar benefit values. As a result of these factors, the economic model tries to choose the recreation prescription with the least cost. An increase in the benefit value would not change this situation. Constraints must be used if the non-priced values of higher experience levels of certain types of opportunities are to be achieved. Increasing the benefit value would change the PMV of the Alternatives, but it would not change the allocation. The existing benefit value is sufficiently accurate to reflect the relative economic tradeoffs between alternatives.

The weighted average wildlife recreation benefit value from the 1985 RPA is not significantly different than the value used in the Plan.

The objective of developed recreation on the Forest is to provide a type of recreation opportunity in a forest environment or near public lakes that is not normally provided by the private sector. These opportunities are limited.

For the same reasons described for dispersed recreation, the emphasis level on developed recreation within existing campgrounds would not change as a result of increasing the benefit value. The amount of recreation visitor days that can occur in these areas is limited by the number of campsites. An increase in emphasis in these areas results in higher maintenance levels and service levels but does not increase the recreation opportunities. Only the non-priced experience level changes. Since numbers of users change little until the maintenance level is so low that the campground has to be closed, the economic model will choose the lowest cost alternative that keeps it open. Changing the benefit value would not change this situation.

Since long term projected demand for developed recreation is higher than supply, increasing the benefit value could have resulted in the model choosing an option that resulted in the construction of additional facilities. On the Proposed Action Alternative we forced the model to choose the option that did this. The chosen prescription provided for the maintenance of existing facilities and the construction of the Quemado Lake Campground. Changing the benefit value would, therefore, have resulted in a higher PMV for the Proposed Action Alternative but it would not have resulted in a change in the allocation.

We continue to believe that, for analysis purposes, the recreation benefit values used for the Gila are an adequate representation of relative values. CHEC-4

You correctly point out that "demand," in an economic context, described a price-quantity relationship. It is usually assumed that as prices for any good rise, "demand" is reduced. At lower price levels, more is "demanded" by consumers. You state that the Gila should have estimated a "demand" curve (a price-quantity relationship) for range and timber.

We agree that in an ideal situation, each Forest should estimate both demand and supply for all goods and services produced by the Forest. Ideally, these would also be projected through time. While we agree in principle with your comment, we must add that it is impossible for the Gila (or any other National Forest) to estimate "demand" and "supply" curves using the commonly described variables in economics text books. This is true because of theoretical, methodological, and budgetary constraints.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

The EIS notes that future timber use projections are based on the Outlook for Timber in the United States, a Forest Service publication prepared in 1972. Based on this publication, the EIS projects demand in 50 years to be 99 million board feet — nearly three times current harvests (EIS page 74).

In fact, the Outlook for Timber used "demand" in the same way that Gila planners applied the term to range — use at current prices. The significant increase in demand projected by the Outlook assumed that timber prices remained constant. In fact, an increase in timber prices would significantly reduce the quantity of timber demanded from the national forests.

Planners extended this assumption to pulpwood (trees smaller than nine inches in diameter). Although sales of this size timber have been negligible — and in fact require heavy subsidies — planners assumed that it is worth nearly three times the prices recently bid for Douglas-fir sawtimber.

For both grazing and timber, these assumptions regarding demand result in severe distortions in the planning process. Planners first claim that demand is extremely high and place an inordinately high value on the quantity demanded. Planners use this information to justify high levels of grazing and timber outputs.

Yet plan implementation takes place on a very different basis. The current grazing fee formula is based on the estimated value of livestock minus the producer's costs. Appraised timber prices are similarly calculated, logging and manufacturing costs are subtracted from lumber prices. In both cases, producers are provided with planned levels of outputs at prices which guarantee them a profit. The result is that benefits are far lower than claimed by the Plan.

To be fair, the writers of the AMS state that demand is used in an untraditional sense in that report. No such statements are found in the EIS or Forest Plan, however, which are largely based on the same assumptions. Planners should not confuse "use at current prices" with demand. Moreover, they should make estimates of demand as a price-quantity relationship for both grazing and timber.

Less confusion exists regarding recreation demand. Planners estimate that the current capacity for most forms of recreation greatly exceeds current use. Forest-wide, the capacity for developed recreation is about 321,000 visitor days, while current use is only 151,200. The capacity for dispersed recreation (not including wildlife-oriented recreation or wilderness recreation) is estimated to be 5,575,270 visitor days, while current use is only 402,700 visitor days.

Use is expected to increase at fixed rates. For example, dispersed recreation use is expected to increase by two percent per year, which compounded annually would be 22 percent in 10 years and 170 percent in 50 years. However, planners neglected to compound this increase and assumed use would increase by 20 percent in ten years and 100 percent in 50 years.

Even correcting for this mathematical error, it will take well over 30 years for developed recreation use to exceed current capacity, and well over 100 years for dispersed recreation use to exceed capacity. This implies that the variation of most recreation outputs among alternatives will be trivial. Planners correctly assessed this as shown in table 9 on page 45 of the EIS.

Despite data in table 9, planners did not hesitate to claim credit in the text of the EIS for recreation opportunities provided by new roads. As page 33 of the EIS says, "Timber activities in [the preferred] alternative will result in the largest roaded area by the end of 5th decade." The proposed action will also maintain the most number of miles of high-standard roads (EIS page 36).

Planners claim that these roads will increase "motorized recreation experience" (EIS page 32). In reality, motorized recreation use will remain about the same for all alternatives.

The Forest did not estimate demand for sawtimber and products using all of the explanatory variables which might be suggested by conventional economic theory. That is to say, Gila personnel did not empirically estimate anticipated future needs for sawtimber and products considering future estimates of incomes of consumers, tastes of consumers, technological advances, relative supplies and prices of all other goods, preferences of consumers, and so forth, as is usually suggested in conventional microeconomic theory. Such an approach would result in an estate of the price/quantity relationship often depicted in conventional supply and demand schedules.

The Gila used the approach of examining historic pattern of sales. The future need figures used in the draft Environmental Impact Statement were based on the timber sold between 1971 and 1980. The data used for this projection is displayed in the draft Environmental Impact Statement in Table 21. Table 21 was also intended to show the timber sold in 1981 through 1984 and the average volume sold during the 10 to 15 year period. During the public involvement period, we discovered that the information for the last four years in the table was timber offered, not timber sold. This table has been corrected and a new average has been calculated based on the corrected information for 15 years. This average is considered to be the demand in the first decade. The existing mill capacity is above this figure. Considering the existing mill capacity and the volumes that have been sold in years when the economy was strong, we have now projected the long term demand level to be approximately 30 MMBF. The timber issue discussion has been modified to reflect this level. The proposed action has been modified and has an allowable sale quantity equal to the average volume sold in the last 10 to 15 years.

We do not agree that the assumptions regarding demand for grazing results in distortions in the planning process. Demand is only one factor used to determine the appropriate level of grazing. The effects on communities, management of the range resource and implementability were more considerations than demand. Most permittees on the Forest are dependent on the Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions than projected in the Proposed Action Alternative in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. The Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

CHEC-5

You stated in your comment that the Forest claimed value in the text of the DEIS for recreation opportunities provided by new roads as justification for road construction in the Plan. We disagree. The page reference provided refers to one of the discussions of the changes in recreation opportunities. The opportunity for motorized recreation increases, not the amount. New road construction projected in the original Proposed Action Alternative would have resulted in fewer acres available in the semi-primitive recreation opportunity class and more acres available in the roaded opportunity class. This discussion refers to supply not the amount used. Because supply exceeds demand, the total dispersed recreation use in each class will not change, but use in the semi-primitive class would have been slightly more concentrated and use in the roaded class would have been spread over more roads and acres. This relationship was described in more detail on pages 91, 92, and 118 of the DEIS.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

One area where use is expected to quickly reach capacity is in primitive recreation on the Glenwood Ranger District, where the San Francisco River and Hells Hole roadless areas are located. Dispersed recreation capacity in general on this District greatly exceeds use, and at a two percent rate of increase use will not reach capacity for 140 years.

Primitive recreation capacity, however, is estimated to be about 13,800 visitor days per year. Current use is 11,800 visitor days. At the two percent rate of increase, use will reach capacity in only eight years from 1981, when the use figures were estimated. This implies that there is a need to protect these two roadless areas from development.

Table 9 of the EIS does show a major variation in wildlife recreation outputs. Rather than using capacity-use relationships as an indicator of potential wildlife recreation, planners assumed that increases in wildlife populations would "draw" recreationists to the Forest. Alternatives which were estimated to increase wildlife produced more wildlife recreation.

Table 9 clearly shows that alternative F -- the amenity alternative -- produces far more wildlife recreation (and, in effect, more wildlife) than the preferred or any other alternative. This difference increases over time, as wildlife recreation in the preferred alternative steadily declines while wildlife recreation in the amenity alternative steadily increases.

It is difficult to determine just how much of this additional recreation is due to reduced levels of timber and domestic grazing and how much is due to increased funds for wildlife habitat improvement measures. As described below, the amenity alternative requires a huge budget for wildlife

The EIS contains some questionable statements regarding wildlife habitat and diversity. Page 109 claims that "Management for a mix of vegetative types and successional stages in small areas benefits diversity. Age class distribution in lower successional stages in suitable timber areas affect the diversity. This argues that more timber harvesting will improve wildlife habitat."

In fact, alternatives with greater amounts of timber cutting greatly reduce diversity. For example, 200 years from now the preferred alternative is expected to have 91 percent of tentatively suitable timber lands in early successional stages. This is extremely unbalanced. By comparison, the amenity alternative will have only 46 percent of timber lands in early successional stages.

Planners identified five critical habitat types on the Forest: old-growth thermal cover, turkey roosting sites, squirrel nesting sites, and herbaceous forage and cover. All but the last, which is not generally found on timbered areas, are expected to be dramatically reduced by the preferred alternative.

These facts all imply that the timber program of the preferred alternative -- indeed most of the alternatives -- will substantially reduce plant and animal diversity. This is underscored by the fact that planners failed to understand that old-growth and other undisturbed stands provide a high amount of vertical diversity -- forage at ground level, habitat for cavity nesters and birds at higher levels, cover at all levels -- while managed forests tend to provide only horizontal diversity.

It appears that timber management, grazing, roads, and other developments can do little to improve recreation values on the Forest. They can, however, be detrimental to wildlife and wildlife-oriented recreation.

CHEC-6

We feel that you have apparently misinterpreted some of the data from planning records and interviews of Forest personnel. Wilderness use and capacity on the Glenwood District portion of the Gila Wilderness have been taken out of context from their relationship to the Gila Wilderness as a whole. A minor part of the Gila Wilderness is located in Management area 4C and 4D on the Glenwood District. The planning records that you cite present use and capacity for these two management areas. However, nearly all of the present use is at trail heads from which visitors to the Gila Wilderness disperse themselves throughout the Wilderness.

The present use and estimated capacity for the Glenwood District portion of the Gila Wilderness cannot be used out of context by themselves to draw conclusions about the need for additional wilderness. The Gila Wilderness is not even close to being used near capacity. Capacity for the Gila Wilderness is estimated to be about 513,000 RVDs. Current use is about 117,000 RVDs and using the 170 percent factor you suggest, current use could be expected to grow to about 199,000 RVDs in 50 years. In 50 years, capacity would still exceed projected use by 257 percent. In addition, the Blue Range Wilderness in the Glenwood area, is virtually unused. Present use on the Blue Range Wilderness is about 1,000 RVDs and capacity is about 40,000 RVDs. Capacity thus exceeds use by 4,000 percent. Similarly, the nearby Aldo Leopold Wilderness has capacity that exceeds use by 1689 percent. Capacity and use figures do not indicate a need for more wilderness recreation opportunities in the area in the foreseeable future.

CHEC-7

The wildlife recreation outputs were based on capacity/use relationships. Demand for wildlife recreation use was estimated and it was assumed that wildlife recreation use would occur up to the estimated demand level as long as capacity was available. There is presently more demand, particularly for big game hunting, than is being satisfied. Therefore, it was assumed that increases in wildlife populations, particularly increases in big game populations, would satisfy more of the unmet demand and would result in more wildlife related recreation.

Alternative F results in habitat conditions that will stimulate the greatest increase in wildlife related recreation. The Proposed Action also results in a steady increase in wildlife populations and recreation rather than the decrease that you state in your response.

CHEC-8

We disagree that the original Proposed Action greatly reduces diversity. You make the statement that "Alternatives with greater amounts of timber cutting greatly reduce diversity" but you have not offered any references to substantiate your statement. Diversity is affected by the mix of early and late successional stages and the distribution and juxtaposition of age classes. Large areas characterized by a single vegetative type of single successional stage have lower levels of diversity than smaller areas having a better mix. Diversity is also affected by the level of wildlife planning, improvement, coordination, and the level of prescribed fire (DEIS, page 109).

All of these diversity factors were analyzed for each alternative. As was shown in DEIS Table 57, diversity increased under the original Proposed Action rather than being greatly reduced as you stated. We disagree with the calculations that you use to support your conclusions. You stated that the Proposed Action results in 91 percent of the suitable timberland being in early successional stages and that Alternative F has 46 percent of the suitable timber land in early successional stages. In order to come up with these percentages you had to assume that all age classes from 0-120 years old are early successional stages. We do not agree with that assumption, but even if 0-120 years is used as early successional stages, it is not appropriate to consider only suitable timber in the consideration of the effects of any alternative on diversity.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

Timber Benefits vs. Costs Although the Gila EIS displays the benefits of the Plan by resource, planners fail to present the costs by resource. Yet these costs are clearly calculated in FORPLAN.

The preferred alternative FORPLAN run indicates that sale preparation and administration for the proposed level of timber sales in the Plan will cost \$478,500 per year. Purchaser built roads, including Forest Service engineering, construction, reconstruction, and maintenance, will cost \$1,094,700 per year. In addition, the Forest Service expects to spend \$319,000 per year on reforestation and timber stand improvement.

Although some of the road costs are "capital investments," nearly half these costs -- \$406,000 per year -- are maintenance. Maintenance costs are expected to increase over time to over \$500,000 per year and will be required as long as the timber program is continued.

Thus, the timber sale program alone, which is expected to gross less than \$1 million per year, will cost \$884,500 per year simply to administer sales and maintain needed roads. "Investments" in new road construction, reforestation, and timber stand improvement will cost over \$1 million per year. Returns on these investments will be trivial.

Costs are especially high when compared with the receipts for cable logging on steep slopes, sales in mixed conifer forests, and commercial thinning sales. Each of these types of timber have such low values that they must be "cross-subsidized" by selling them in combination with other, higher valued timber which is sold for less than its true value. In addition, management in roadless areas and on low sites is likely to produce minimal returns.

For example, harvest of timber on steep slopes (over about 40 percent) requires cable logging systems which, according to planners, cost \$25 to \$40 more per thousand board feet than tractor logging. Since current timber values average only about \$28 per thousand, most cable yarded material has a negative value. For this reason, the Forest Service has committed itself to selling cable-logged timber only in combination with tractor-logged timber in the same sales.

The Adam-Onion sale is the first sale with cable logging sold by the Gila Forest. Sold in 1985 for the minimum bid price of \$8.98 per thousand board feet, the sale included 5,946 million board feet of timber which will be tractor logged and 3.6 million board feet which will be cable logged. (All dollar values pertaining to this sale are in 1985 dollars.)

Appraisers estimated that the average cost of tractor logging would be \$15.59 per thousand board feet. The average cost of cable logging is estimated to be \$69.81 per thousand. The average logging cost for the sale as a whole is \$36.42 per thousand.

Since the net value of the sale as a whole is \$8.98, and cable logging costs \$33.39 more than the average, the cable-logged timber has a net value of -\$24.41. The tractor-logged timber is worth an average of \$29.81.

When cut, the sale will produce total revenues of \$84,825. However, if the tractor-logged timber had been sold alone, it would have produced revenues of \$177,250 -- \$92,425 more. This difference is equal to the revenue loss from including the cable-logged timber in the sale.

In addition to the revenue loss, the Federal Treasury had to pay for sale preparation and administration, roads, reforestation, and other costs for the cable-logged units. These costs may total to \$50 per thousand board feet, increasing the total losses to over \$350,000.

The Federal Government is not the only loser from the sale. Counties in which the Gila is located receive 25 percent of gross national forest revenues. Since cable-logging reduced revenues by \$92,425, counties lost over \$23,000. This is an average loss of \$6.42 per thousand board feet.

The Gila Forest Plan proposes to use cable logging to harvest 8.5 million board feet per year over the next ten years. If the Adam-Onion sale is typical, this program will cost counties well over \$50,000 per year in foregone receipts and cost the Federal Government far more.

There are presently approximately 285,000 acres of timbered area on the Forest (ponderosa pine and mixed conifer). Of this forested acreage, approximately 35 percent exists as old growth. At the end of 50 years, the original Proposed Action Alternative projected a mix of age classes with approximately 25 percent old growth. Since there is suitable and unsuitable timber scattered throughout the Forest, there would be old growth stands scattered throughout the Forest. Even if all 0-120 age timberlands are considered early successional stages and old growth is considered late successional stage, this is not a great reduction in diversity as you indicated. In Alternative F, the projected fifth decade mix would result in approximately 30 percent old growth.

In the final Plan the projected timber harvest activities have been modified. This will result in retention of more of the old growth acres on the Forest. At the end of 50 years, the modified Proposed Action Alternative projects an age class mix containing 30 percent old growth. CHEC-9

As noted in earlier Forest Service responses, significant changes in timber harvest have been made for the revised Proposed Action. Timber sale values have been reduced and both the acres managed for timber production and the associated roading have been revised downward considerably. In addition, the revised timber program includes less than half of the original acres proposed for timber stand improvement investments. Reforestation investments remain at close to the original level. All of these factors have contributed to a substantial reduction in timber costs over the original program. It must be remembered that the timber program on the Gila is managed to produce other outputs and conditions on the ground, not just timber. Because there are joint costs and returns for the timber program, a comparison of timber benefits and costs alone may not yield an accurate relationship between all benefits and costs.

CHEC-10

In your comment you state that cable logging is highly uneconomical. The Adam-Onion timber sale is displayed as an example of this claim. According to your calculations, if this sale had been sold as a tractor-only sale, it would have produced \$92,425 more than it actually did. In addition, you state that the counties lost \$23,000 in revenue shares for this sale alone. According to your analysis, if this sale is typical, then cable logging will cost counties on the Gila over \$50,000 per year in lost revenues. We do not feel that your analysis is correct.

The inclusion of cable logging units in the Adam-Onion sale actually increased revenues and increased payments to counties. The following display shows the relevant parts of the timber sale appraisal process for the sale -- both with cable and without cable. All estimates are taken from the same timber files you used. As shown below, the total logging cost with the cable was about \$172/MBF and \$154/MBF without the cable. In either situation, the cost of production (logging costs plus manufacturing costs) exceeded the selling values and the timber would have been sold for base rates -- about \$8/MBF. The total revenue for the 25 percent fund was \$86,200 with cable and \$53,880 without cable. This is an increase of \$32,320 by including cable. County receipts were increased by about \$8,100 by including cable logging.

This analysis shows that the your claims are in error. Since the Adam-Onion sale is fairly typical, the claim that counties would receive less revenue is not true. CHEC has made similar claims for other New Mexico Forests; however, in no case examined in New Mexico has cable logging, used in conjunction with tractor logging, resulted in less revenue to the Federal or local government.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

Many sales of mixed conifer stands are also cross-subsidized. Although Douglas-fir, spruce, true fir, and other species have sold for an average of \$6 per thousand board feet since 1981, this may be more than the true value of these species. Virtually all sales which include these species also include significant volumes of ponderosa pine.

For example, a sale sold in 1983 included 4 million board feet of ponderosa pine and 110 thousand board feet of Douglas-fir. The appraisal found that the pine was worth \$44.05 per thousand, while the Douglas-fir was worth \$28.38 per thousand. Timber cannot be sold for less than a minimum price of \$1 per thousand plus estimated reforestation costs, which in this sale totalled to \$6 per thousand board feet.

The Douglas-fir was sold for this minimum value. To compensate the purchaser for having to take Douglas-fir for this "high" price, the price of the ponderosa pine was reduced to \$43.11 per thousand.

Total sales of mixed conifer timber have been minimal in the past. The Forest Plan proposes to increase sales of this timber to 43 percent of the total. This will significantly increase revenue losses and cross-subsidies.

Commercial thinning, which mainly removes small trees of low value, may also cause a revenue loss. The Forest Plan calls for as many as three commercial thins every 20 years until timber is final harvested in a two-stage shelterwood cut.

To date, the only commercial thin which the Gila has attempted to sell received no bids. Managers may decide to cross-subsidize commercial thins by including final harvests of sawtimber in the same sales -- a common practice in the Pacific Northwest. While the Forest Plan does not propose significant volumes of commercial thinnings immediately, volumes are expected to significantly increase in the next 50 years.

Adam-Onion Timber Sale Logging Costs and Shared Revenues

	With Cable	Without Cable
Volume (MBF)	9600	6000
Harvest Cost (\$/MBF)		
Felling and Bucking	15.59	\$15.59
Skidding	36.69	16.97
Loading	7.69	7.69
Total	59.97	40.25
Transportation	81.08	81.08
Administrative	20.19	18.32
Environmental Protection		
Slash Disposal	5.61	5.61
Erosion Control	.41	.62
Total	6.02	6.23
Temporary Developments	.76	.76
Total Harvest Costs	168.02	147.10
Specified Roads	4.14	6.63
Total Logging Costs	172.16	153.73
Advertised Rates	8.98	8.98
Total Revenue for 25 percent fund	\$86,200	\$53,880
Additional Payments to Catron, Grant, Hidalgo, and Sierra Counties	\$21,550	\$13,470

CHEC-11

You are correct in noting that "virtually all sales which include these species [fir and spruce] also include significant values of ponderosa pine." It is also correct that most of the volume harvested in the past has been ponderosa pine rather than mixed conifer. As a result of changes made in the Proposed Action timber program, there will be no significant increase of mixed conifer harvest. This and other important changes are shown in the Proposed Action Changes Summary at the beginning of this document.

CHEC-12

This portion of your comment is very speculative. You stated that "Commercial thinning may also cause a revenue loss" and that "managers may decide to cross-subsidize commercial thins by including final harvests of sawtimber in the same sales". As you state, "the Forest Plan does not propose significant volumes of commercial thinnings immediately". In the first decade the plan proposed very little commercial thinning volume. The plan will be revised before significant commercial thinning is to take place. At that time demands can be reanalyzed and the necessary actions can be taken.

LETTER 1-CHEC

FOREST SERVICE RESPONSE TO LETTER 1-CHEC

Roadless areas might be an appropriate addition to this list of costly areas. Even where ponderosa pine is the dominant species and slopes are gentle, new road construction costs may easily outweigh the value of timber. Since counties receive a share of gross revenue, they are not affected by these construction costs. However, it is difficult to justify road construction in roadless timber lands at today's timber prices.

13

Finally, timber management is not worthwhile on low sites on the Gila. Only 23 percent of the "tentatively suitable" timber lands on the Gila are capable of producing over 50 cubic feet of wood per acre per year, and 96 percent of that cannot produce more than 85 cubic feet. The remaining 77 percent produces well under 50 cubic feet. Most of these acres, no matter how efficiently managed, will lose money on timber management forever. For comparison, top quality lands in the Northwest or South easily produce over 200 cubic feet per acre per year.

14

CHEC-13

Changes in the timber program in the Proposed Action have resulted in changes in the effects on unroaded areas. Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be effected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain their semi-primitive recreation opportunities. This means that only 3% of the existing unroaded area on the Forest would be developed during the life of the Plan.

Our analysis on unroaded areas indicates that your conclusions are to general to be accurate. In some cases it is true that with the benefit value used in the plan, it is not economical feasible to enter some unroaded areas. In other cases, the volumes per acre are high enough to provide high timber benefits. We have considered the costs and benefits of timber activities in these areas and feel that the Proposed Action Alternative provides for a high level of net public benefit while addressing the concern to maintain areas available for semi-primitive recreation.

CHEC-14

We do not agree that much of the tentatively suitable timber lands on the Gila can not be efficiently managed for timber production, but even if some sales do not make money, other considerations provide for positive net public benefits.

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas, for example, are designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that need to be taken into consideration in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are taken into consideration, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

Grazing Benefits vs. Costs The Plan proposes to spend \$875,000 per year on grazing, including range operations and maintenance, range improvements, and replacements of old range improvements. This averages \$2.52 per AUM, significantly less than the \$7.88 which planners claim AUMs are worth and even less than the \$4.02 which the Grazing Fee Review says AUMs are worth -- but 133 percent more than current grazing receipts.

Proposed permitted grazing use is 33,200 AUMs per year, or over 10 percent, more than the estimated current capacity. In order to increase capacity, the Plan calls for spending a great deal of money on range improvements. This expenditure is far greater than the value of grazing no matter how it is measured.

Alternative F in the EIS is the only alternative which proposes to reduce permitted grazing use to current capacity. Range management under this alternative is expected to cost \$529,000 per year -- \$346,000 less than the preferred alternative. This \$346,000 is needed only for the additional 33,200 AUMs which the preferred alternative will provide. The average cost per AUM is \$10.42 -- far more than even the Plan's estimated grazing value.

While the Plan proposes huge expenditures for timber and grazing projects of dubious value, the proposed budget for recreation and wildlife is modest. An annual expenditure of \$743,000 is planned, including \$254,000 on developed recreation, \$112,000 on dispersed recreation, \$118,000 on wildlife recreation, and the remainder on fish and wildlife activities including habitat improvement.

This expenditure will produce a return of \$10 to \$20 million, a benefit-cost ratio of at least 13 to one. While actual receipts are much smaller -- 1984 receipts were about \$19,000 in fourth quarter 1980 dollars -- these could be significantly increased. Yet there is no question that total value is much greater than the costs.

Effects on Employment Although planners used IMPLAN, which is designed to assess the effects of alternatives on employment and personal income, they made no attempt to analyze the results and published minimal information in the EIS. According to CHEC's review of IMPLAN runs, the Gila produces about 5.2 jobs for every million board feet of timber cut, 5 jobs for every thousand AUMs of cattle grazing, and 4.7 jobs for every 10,000 recreation visitor days. Another 1.5 jobs are produced for each million board feet of fuelwood sold.

The proposed Plan, then, will produce about 182 timber jobs, 177 grazing jobs, 14 jobs from fuelwood sales, and 474 recreation jobs. The number of recreation jobs is far more than the number of timber and grazing jobs combined.

Counting both operational and capital costs, the timber program will cost about \$1.9 million per year and return only about \$530,000. This means that each timber-related job will cost over \$5,200 per year. Jobs associated with timber cutting on steep slopes or sales of mixed conifer timber will, of course, cost far more. Cable-logged timber, for example, will cost well over \$10,000 per job.

When counting grazing receipts against costs, the proposed grazing program is expected to lose over \$500,000 per year. This is a cost per job of nearly \$3,000. An estimated 17 jobs depend on keeping permitted use 10 percent above current capacity, and these jobs will cost over \$20,000 per year each.

When counting total grazing value, the average grazing job produces more value than its cost. However, the 17 jobs which depend on increasing grazing capacity will cost \$5,000 each or \$12,000 each per year depending on whether the ERS estimate or the Grazing Fee Review estimate of fair market value is correct.

When counting expenses against receipts, each recreation job created by the Forest costs about \$1,500 per year. When counting total recreation value, of course, recreation jobs have no cost.

CHEC-15

We disagree with the process that you used to make your determination that the average cost per AUM is more than the estimated grazing value. When calculated correctly, using both AUMs of added capacity and AUMs of existing capacity sustained through the maintenance of range improvements, the cost per AUM is actually less than the benefit value used in the Plan. These costs are greater than the grazing receipts, but grazing receipts do not represent the true benefit value. If this were the case, wildlife and dispersed recreation would not have been assigned a benefit value since they do not return dollars to the treasury.

You contend that Alternative F is the only alternative which proposes to reduce permitted grazing use to current capacity. You then use the costs in Alternative F compared to the Proposed Action Costs to show that it costs \$46,000 to get 33,200 AUMs. This analysis is incorrect.

First, the additional AUMs of capacity in the Proposed Action Alternative is 35,200 not 33,200. Second, the \$529,000 per year range costs in Alternative F does not sustain the current capacity as you contend. In Alternative F the grazing capacity is actually projected to decrease over time to a sustained level of 284,585 by the fifth decade. This is because at the funding level in Alternative F, not all existing range improvements would be maintained. The first decade level is close to sustained with the funding level in the Alternative. Lack of maintenance funding in the first decade sets up the decline projected in out decades.

When the Alternative F capacity decline is included in the analysis, we find that the additional \$346,000 in the Proposed Action Alternative not only results in increasing the existing capacity by 35,200 AUMs, it also sustains approximately 30,500 AUMs that would be lost at the funding level in Alternative F. This means that the 65,700 AUMs that were either added to the existing capacity or were sustained above the level in Alternative F are actually costing \$5.27 per AUM as compared to a benefit value of \$7.88, not the \$10.42 cost per AUM that you calculated.

CHEC-16

As mentioned in earlier responses, it is not correct to associated only single resource benefits with single resource costs. All costs are joint production costs and result in multiple benefits. As a result, individual resource costs provide employment in many employment sectors through the multiplier effect on employment and by resulting in changes in other outputs. Even if it was acceptable to associate single costs with single benefits, however, your analysis of costs of jobs created is incorrect.

The first job cost you refer to is the cost of creating timber jobs. Your analysis indicates that each timber job created costs \$5,200. You did not indicate how you arrived at the costs and returns that you use in your analysis but we have analyzed our data and have found that even with the modified benefit values used for the final Proposed Action, benefits are higher than costs. If all of the timber offered in the original Proposed Action Alternative were sold at an amount equal to the average selling value between 1978 and 1982, there would have been a net return to the treasury and no cost for creating the timber jobs. The only way we can come close to duplicating the numbers that you have in your response is to use the \$28.00 benefit value that you suggest in your comment number 1. As stated before, we do not feel that a benefit value developed from only low timber years is acceptable. We feel that the benefit value developed for the modified Proposed Action Alternative is a good average of high and low years.

The next job cost that you refer to is the cost of creating grazing jobs. We agree that when counting grazing receipts against costs, the cost per job is between \$2,300 and \$3,000 per job. As you mention, however, when counting total grazing value, the average grazing job produces more value than its costs. For the same reasons explained in our response to your comment 15, however, the remainder of your analysis is incorrect.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

Side-Benefits From Timber and Grazing Reduced fire protection costs, improved recreation access, control of insects and disease, and protection of local economies are all frequently cited as justifying selling timber at a loss. Protection of local communities is also used to justify grazing at a loss. None of these reasons apply to the Gila.

Planners carefully estimated the relative costs of fire protection and emergency fire suppression in managed timber areas and in wilderness and unroaded timber areas. Fire protection was found to cost nearly eight times as much on acres in the suitable timber base as in wilderness. Emergency fire suppression was estimated to cost three to 25 times as much in developed timber areas as in unroaded timber and wilderness.

New timber-related roads also produce no new recreation values. The current roaded recreation capacity of the Gila is already far greater than current use. Increasing capacity may transfer use from one part of the forest to another, but will not increase total use or recreation value.

Major insects and disease problems on the Forest include dwarf mistletoe and spruce budworm. These pests may reduce tree growth, but if trees have no economic value there is no economic loss. They may also kill some trees in a stand, but mortality will rarely be heavy enough to cause a serious fire hazard.

Spruce budworm, which attacks mainly the low-valued mixed conifer species, can probably be handled at least cost using *Bacillus thuringiensis* on severely infected stands. Dwarf mistletoe, which mainly attacks ponderosa pine, can be treated through normal silvicultural methods on sites which are productive enough to produce valuable timber.

Local economies may be protected by timber management, but the annual cost of \$5,000 to \$10,000 or more per job in perpetuity is extremely high. Using the Forest Service's four percent discount rate, this represents a capitalized value of \$125,000 to \$250,000 per job. This money could probably produce far more jobs if invested elsewhere.

The same is true for grazing, particularly the 33,200 AUMs which the Plan proposes to produce at an annual cost of \$346,000, or \$20,000 per job. Even after grazing capacity is increased to proposed use levels, a subsidy of \$310,000 per year will be needed to produce some 66,000 AUMs more than alternative F -- a cost of nearly \$10,000 per job in perpetuity.

Summary: Economic analyses cannot provide all the answers, but it can provide a great deal of helpful information. On the Gila Forest, the analysis shows that timber loses a lot of money, grazing at capacity levels may be worthwhile but the costs of raising grazing capacity to 10 percent above current capacity is far greater than the benefits, and recreation has the highest forest value overall.

The analysis indicates that the efficiency of the Plan can be greatly improved by deleting steep lands and forest types which are dominated by species other than ponderosa pine from the suitable timber base, and minimizing planned commercial thinning. These actions will increase both Federal and county revenues. Curtailing the proposal to increase grazing capacity above current levels would also increase the net public benefits of the Plan.

The efficient level for grazing is somewhere at or below current grazing capacity. The efficient level for timber may be something less than 20 million board feet per year -- the proposed level of ponderosa pine minus steep slopes, roadless lands, low sites, and other costly areas. There appear to be few or no side-benefits from timber and grazing which can justify maintaining these programs above the efficient levels.

Land Use in the Gila Forest Plan

The Gila National Forest includes 2.5 million acres of land in New Mexico. The Forest Plan also covers some 790,000 acres of land in the Apache National Forest, also in New Mexico, which is administered by the Gila Forest Supervisor.

Of the total 3.3 million acres, some 2.3 million are considered potentially suitable for livestock grazing and 432,000 are considered "tentatively" suitable for timber management.

When considering jobs sustained or created from sustained capacity or increased capacity, 33 jobs can be attributed to the additional costs incurred in the Proposed Action Alternative. Using only grazing receipts, these jobs cost \$7,800 per job. However, these 33 jobs sustained or created only cost \$1,000 to \$0 per job depending on whether the ERS or the Grazing Fee Review estimate of fair market value is correct.

We agree with your analysis for jobs created by recreation.

Even after reanalyzing the data that you presented, we are not sure what the significance of your comment is. You seem to be indicating that since recreation jobs are relatively cheap to create, [especially using the results of your analysis] that we should create as many recreation jobs as possible. The problem with this idea is that all alternatives provide for 90 to 100 percent of the demanded dispersed recreation, therefore we are creating almost all of the possible recreation related jobs in every alternative. A small increase could occur if big game wildlife recreation and developed recreation was maximized.

Some of the types of jobs created appear to be relatively expensive, but we feel that the social and economic costs of losing jobs could be higher. Even with the modifications in the Proposed Action Alternative, most existing timber and grazing jobs would be sustained. As the demand for recreation increases, some opportunity for new employment will be provided.

CHEC-17

We disagree that none of the other side benefits for timber and grazing apply to the Gila.

Your discussion of our fire cost analysis is inaccurate. It is true that the costs assigned to suitable timber areas is considerable higher than the costs assigned to other areas, but this is not because the actual on the ground costs in those individual areas are higher. In order to apply fire costs to resources that benefited most from fire protection and suppression, fire costs were distributed to areas containing the resources that could be damaged the most by fire. One of these resources is suitable timber. A higher percentage of the fire protection and suppression costs were, therefore, assigned to suitable timber areas. The costs were entered into these areas but this does not mean that the cost would be incurred in these areas. For example, aggressive suppression action may be taken to control a fire in grasslands if there is a high probability of the fire spreading to suitable timber areas. The cost of this fire suppression activity was included with the suitable timber because a high percent of the costs were incurred to protect the suitable timber.

Fire suppression costs were not higher in roaded areas than in unroaded areas as you contend. This situation only existed in the low prescription [where unroaded areas were not considered suitable timber]. On the ground fire suppression activities are usually less expensive in developed areas so fire suppression continues to be a side benefit to timber activities.

We agree that timber-related roads produced no new recreation values because the roaded recreation capacity of the Gila is already greater than the current use. This is not to say, however, that there are no non-priced benefits. Some increase in experience is possible by providing for better distribution of hunters and other dispersed recreationists and by providing a greater variety of opportunities. These non-priced benefits were not priced in the plan but they do provide increased opportunities [just as semi-primitive recreation areas above the demanded level provide additional variety and opportunities].

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

In addition, over 750,000 acres were inventoried as roadless by RARE II. Only 28,000 of these acres which are being studied for Wilderness, are recognized in the Forest Plan. The remainder are not even mentioned in the Plan or EIS even though they may have significant non-timber values.

Table 4 of the EIS shows how acres are allocated by alternative. Every alternative places all 2.3 million potential livestock grazing acres in livestock grazing use.

Every alternative places some two-thirds or more of the tentatively suitable timber acres in the timber base. Some acres of every alternative are on steep slopes, roadless, or other expensive lands. The alternative with the greatest number of suitable acres -- almost 98 percent of potential -- is the proposed action, even though other alternatives propose greater levels of timber harvests over the next ten years.

18

19

20

Even though the side benefits of integrated insect and disease control were not used as rational for the level of timber harvest, we do feel that these are important side benefits. None of the data that you have provided proves that trees on the Gila have no economic value, therefore we feel that increased tree growth and less loss from insects and disease have economic value.

Your other concerns related to local economies have been addressed. We continue to feel that there are important side benefits relating the local economies.

CHEC-18

The allocation in the draft Forest Plan was the initial attempt at resolving public issues and providing for a high level of public benefits from the management of the Gila National Forest. At the time issues were generated, the public involved in the issue generation process (including environmental groups) did not specifically mention the management of unroaded areas as a major concern. As a result, no issue was identified. After the passage of the 1980 New Mexico Wilderness Act (which freed areas from other multiple uses) timber sales and other development activities were undertaken in several of the areas that had been RARE II areas. We received no negative response to these activities from any individuals or groups. Because we had no publicly recognized issue related to management of unroaded areas and because we have had no negative response to development activities in some of these areas, there did not seem to be any compelling reason to specifically address the effects on these areas in an issue driven planning process. Because of the concerns expressed on the DEIS, an analysis of the effects of the alternatives on unroaded areas has been included in the final EIS.

CHEC-19

Even though Table 4 showed that all alternatives allocated the same number of acres to range, indirectly, the acres vary by alternative. In the Current Alternative (Alternative A) for example, the deterioration of facilities over time will result in some parts of the Forest receiving little or no use. It is not possible to predict where these areas would be or how soon the use would decline on individual areas. As a result, there was no attempt to say that these areas would not be allocated to grazing.

Allocation of whole allotments to nongrazing options is not considered necessary. Domestic livestock grazing is a legitimate use of the National Forests. Unless grazing needs to be eliminated to meet some other specific multiple use objective, the elimination is not considered appropriate. You have not indicated any multiple use objective that would result in the need to include nongrazing alternatives.

CHEC-20

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 48 MMBF in the fifth decade. The revised plan projects timber harvest at 30 MMBF per year during the first decade. This amount is projected to remain at approximately the 30 MMBF level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54 MMBF. This 30 MMBF level of harvest would be sustained from approximately 63 percent of the tentatively suitable acres.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

Every alternative also makes most acres available for mineral location and leasing. The range from the highest to the lowest alternative is only about 2 percent.

21

No information is provided in table 4 or elsewhere in the EIS on the number of roadless acres which may be developed for timber or other uses. The RARE II supplement for New Mexico indicates that most of the inventoried roadless areas have forested acres within them. Since the preferred alternative proposes to road nearly 98 percent of the tentatively suitable timber base, it can be assumed that most forested roadless lands will soon be roaded.

22

Perhaps the most interesting of these data are the figures on suitable timber lands. According to the table on page 44, the preferred alternative proposes to sell 32 percent less timber than the commodity alternative (D). Yet the preferred alternative requires nearly 10,000 more acres in the timber base.

The reason is that, by the third decade of the Plan, the preferred alternative proposes to sell 50 percent more timber than in the next 10 years and three percent more timber than alternative D. If instead timber sales were maintained at the levels initially proposed, up to 33 percent fewer acres would be needed in the suitable timber base.

23

Given the Gila's low timber values, there is little guarantee that funding will be available 20 years from now to increase harvests by 50 percent. But by selecting the alternative which includes the greatest number of acres in the suitable timber base, planners are giving managers the "flexibility" to harvest timber almost anywhere they please.

The result is that steep slopes, roadless lands, and other expensive areas are likely to be logged when it is far from efficient to do so. Since these areas are not needed to maintain first decade timber harvest levels, they should be eliminated from the suitable timber base.

Section 219.14(c)(3) of the forest planning rules requires planners to consider lands unsuitable for timber management if they are "not cost-efficient, over the planning horizon, in meeting forest objectives, including timber production." The Forest Plan, however, considers thousands of acres of land to be suitable even though those acres are not needed to meet the first decade level of timber sales.

24

Those acres are needed to meet third decade timber sale levels. However, there is no evidence that planners ever considered those sale levels to be an objective. Budget limitations and overestimated timber values, rather than timber harvest goals, played a greater role in FORPLAN results.

The high level of timber harvests produced in the third decade is a result of FORPLAN allocating most available acres to timber because the high timber prices used in FORPLAN justified such allocation. The lower level of harvests in the first decade is due to a budget constraint.

25

Although recreation has the greatest Forest value, the Plan is allocating a maximum number of acres to commodity use. The range of alternatives to this allocation considered in the EIS is not particularly wide, and for grazing there are no alternatives at all.

Although the Forest's capacity for recreation is far greater than current use, roadless recreation use in many areas is fairly close to capacity. One such area is the Glenwood Ranger District, where the two wilderness study areas are located.

Road construction proposed by the Plan, which may not be needed to meet first decade timber harvests, will nevertheless close the option to manage roadless areas for roadless recreation. Roads and timber harvest will also reduce wildlife habitat. For these reasons, planners should seriously consider roadless prescriptions for these areas.

26

Forests in Region 6 (Oregon and Washington), for example, are required to consider primitive (no roads, no timber harvest of any type) semi-primitive (no roads, no scheduled timber harvests) and other roadless prescriptions for roadless areas which were "released" from further wilderness consideration by state wilderness acts. Similar prescriptions are suitable for Gila Forest areas and, in many cases, may be the most valuable use of those areas.

You express a concern that approximately two-thirds or more of the tentatively suitable timber acres or more are managed for timber outputs in all of the alternatives. Not all of these alternatives had timber objectives, but all of the alternatives had an objective of maximizing PNW. On many of the alternatives, the harvest level and the type of areas harvested is a result of the maximize PNW objective. We do not have any reason to constrain below this level if the other objectives of the alternative can be accomplished.

CHEC-21

Mineral location and leasing were not identified as a major issue during the issue identification phase of planning. As a result, management of this resource while meeting alternative objectives is accomplished through leasing stipulations rather than recommending large areas for non-lease or withdrawal. With the emphasis on energy independence, obtaining withdrawals on large areas is not a feasible management option.

CHEC-22

The effects of development activity on unroaded areas has been added to the EIS. The reason this information was not included in the draft is explained in our response to your comment number 18.

CHEC-23

You are correct that the original Proposed Action provided less volume than Alternative D but still had more suitable timber acres. Your assumption for the reason for this, however, is incorrect. The number of suitable timber acres were higher because the original Proposed Action Alternative contained more considerations for the maintenance of diversity and visual quality. These considerations resulted in lower harvest volumes per acre and more acres managed to obtain the volume in the Alternative. The volumes in out decades were the result of the benefit value used for timber and not a plot to give the managers "flexibility" as you infer. If "flexibility" were the reason for the suitable acres, the 10 year timber sale plan would have been presented in much less detail. The 10 year timber sale plan provides direction on where timber will be harvested in the next 10 years. As mentioned in response to your concern number 20, the harvest volume projection has been changed. A more complete description of the change is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

CHEC-24

We agree that timber benefit values are the primary reason for the high timber outputs in out decades. This has been changed in the modified Proposed Action Alternative.

CHEC-25

We disagree that there are no grazing alternatives in the DEIS. Domestic grazing outputs vary significantly between alternatives. (also see response to your comment # 19)

CHEC-26

Roadless recreation use is not close to capacity on the Forest. Many options for management of unroaded areas will be maintained in the modified Proposed Action Alternative. Approximately 97 percent of the unroaded area on the Forest will be managed to maintain semi-primitive recreation opportunities for the first decade.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

The Budget for the Gila Forest Plan and Alternatives

While the range of alternative land allocations is particularly narrow, the range of alternative budgetary allocations is fairly wide. As shown in table one, the annual budget over the next ten years varies greatly among alternatives, particularly for recreation and grazing.

Table One

Annual Budget for the Gila National Forest Under the Proposed, Commodity, and Amenty Alternatives (thousands of fourth quarter 1980 dollars)

	Proposed	Commodity	Amenty
Recreation	486	294	569
Fish & Wildlife	257	176	1,001
Range	675	946	529
Timber	1,903	1,530	618
Soil & Water	80	127	76
Minerals	91	91	68
Fire	3,233	4,008	3,391
Law enforcement	66	106	76
Land management planning	140	140	140
Landownership management	156	166	156
Roads	494	760	526
Facilities	235	269	229
General administration	1,434	1,434	1,434
Reforestation	161	12	0
Timber stand improvement	158	39	65

As would be expected, recreation and fish and wildlife budgets are greatest in the amenity alternative and least in the commodity alternative. Similarly, the grazing budget is least in the amenity alternative and greatest in the commodity alternative.

Surprisingly, however, the timber budget is greatest in the preferred alternative. This is even more striking when reforestation and timber stand improvement costs are considered. This implies that much of the timber budget may be superfluous.

Although it is not surprising to see recreation and fish and wildlife budgets differ by alternative, it is surprising to see such great differences. The EIS indicates that non-wildlife recreation levels will vary only slightly between alternatives. This implies that the additional recreation expenses of the amenity and preferred alternatives may not be worthwhile.

The amenity alternative spends almost \$750,000 per year more on wildlife than the preferred alternative. This is partly responsible for an additional estimated 105,000 wildlife-recreation visitor days per year in the first ten years. At an average value of \$21 per day, this has a total value of \$2.2 million. Wildlife recreation also produces an estimated 5 jobs for every 10,000 visitor days, so the amenity alternative produces 52.5 jobs more than the preferred alternative.

While this would seem to be a worthwhile investment, it is difficult to determine how much is due to the added costs and how much is simply due to smaller timber and grazing outputs. It is unlikely that funds for the wildlife activities contemplated by the amenity alternative will be available.

Planners should develop and consider an alternative which, like the amenity alternative, produces substantially lower timber and livestock grazing outputs but provides high recreation and wildlife opportunities without major new investments. This would show how much wildlife recreation depends on habitat improvements and how much is simply a result of reduced conflicts between wildlife and commodity use.

CHEC-27

We disagree that the range of alternatives is narrow. As shown in the DEIS, the range of outputs is wide and the range of resource budgets is wide.

CHEC-28

In this comment you explain that the wildlife budget is the greatest in the amenity alternative, the grazing budget is least in the amenity alternative, etc. You seem to feel that this is logical but you seem to be surprised that the timber costs are high in the original Proposed Action Alternative. Since the original Proposed Action Alternative produced the second highest level of long term timber outputs, it does not seem surprising that it would have one of the highest timber budgets.

As explained in our response to comment 14, however, it is not correct to single out a single cost and attach a single output to that cost. You suggest that the data implies that parts of the timber costs may be superfluous to the need. You reached this conclusion by stating that the timber budget is highest under the Proposed Action Alternative but the outputs are not the highest.

The higher costs were actually a result of logging less volume per acre because of nontimber considerations (wildlife, visual quality, etc.). There are, therefore, more acres that need to be regenerated and more acres on which to do timber stand improvement. Other "timber" costs were also increased to provide for more detailed timber sale preparation and administration required to allow other multiple use objectives to be met in the timber sale areas.

Even though we felt that it is important to explain the reason for the timber cost situation that existed on the original Proposed Action Alternative, it is also important to state that the situation no longer exists on the modified Proposed Action Alternative. Because of public concern with the level of harvest in the original Proposed Action Alternative, the harvest level has been reduced. The "timber" costs are no longer the highest of all alternatives.

CHEC-29

Non-wildlife recreation varies only slightly between alternatives because the recreation capacity of the Forest is higher than the demanded level. Only the demanded level is valued so little variation is anticipated.

Budget differences between alternatives have little effect on the level of recreation outputs but they do have an effect on the quality of the recreation experience. In some alternatives trail maintenance, dispersed site maintenance, etc. is higher. These expenditures provide higher experience levels for some types of recreation.

CHEC-30

In your comment you said that the "amenity alternative produces 52.5 jobs more than the Preferred Alternative". We disagree with this statement. The amenity alternative may produce 52.5 more recreation related jobs, but this is offset by a reduction of jobs in the employment sectors dependent on other resource outputs. Total employment is actually projected to decrease by 34 jobs if Alternative F is implemented. (DEIS page 128)

You also stated that it is difficult to determine how much of the wildlife recreation increase is due to the added costs and how much is simply due to smaller timber and grazing outputs.

Wildlife outputs in Alternative F are due to both increased wildlife costs and smaller timber and grazing outputs. The level of wildlife achieved in Alternative F cannot be achieved without both of these things.

LETTER I-CHEC

FOREST SERVICE RESPONSE TO LETTER I-CHEC

The marginal value of grazing and timber expenses may also be low. The grazing budget of the preferred alternative has already been compared with the amenity alternative (F). The proposed action spends \$346,000 more than the amenity alternative to produce only 33,200 more AUMs — a cost of over \$10 per AUM.

31

The preferred alternative also spends over \$15 million more on timber than the amenity alternative. Timber harvests in the amenity alternative are significantly less than the preferred, but the value could be far greater if the alternative were to eliminate costly lands from the timber base.

32

Unfortunately, over three-fourths of the timber sold by the amenity alternative is low-valued mixed conifer. While the amenity alternative does not sell timber from steep slopes in the first decade, it does every decade after that. The result is that no alternative represents a truly efficient timber management plan.

33

When comparing alternative budgets with alternative land allocations, it appears that planners used the budget, rather than land allocations, as the main tool for varying alternatives. This overlooks the fact that land use is the major point of controversy in national forest management.

34

The final EIS should include a wide range of land uses, including non-timber uses of roadless areas. At least one alternative should include no steep, mixed conifer, roadless, or low site ponderosa pine timber in the timber base. Several alternatives should have variations in the number of acres allocated to livestock grazing. The preferred alternative should only include lands in the timber and livestock grazing base if the Forest Plan can show that the benefits of including those lands are greater than the costs.

35

Additional Problems With the Gila Forest Plan

CHEC's review identified three further problems with the Gila Plan, all related to timber. First, the timber yield tables appear to overestimate potential growth on the national forest. Second, planners did not seriously consider uneven-aged management as an alternative to shelterwood cutting. Finally, the calculation of programmed harvests for Apache and Gila Forest acres together may violate the National Forest Management Act. In addition, the Gila's monitoring program should be substantially improved.

For example, the reduced grazing outputs result in additional forage for wildlife, but the level of wildlife projected in Alternative F would not materialize if water developments and some other developments are not maintained. The portion of these developments that were needed by domestic livestock but are now needed by wildlife are maintained by wildlife funds. In addition, new wildlife improvements are needed.

Reductions in timber outputs also result in reductions in the budgets needed to provide these outputs. Since all alternatives have budget constraints, it would not be possible to provide the needed wildlife budget unless budgets in some other functional areas were reduced.

We disagree that the budget contemplated by the amenity alternative is not realistic. Proposed budgets for all of the alternatives are feasible. Feasibility is the reason we used a budget constraint in all alternatives and did not propose alternatives with budgets substantially higher than the budgets we were receiving in 1980.

CHEC-31

Please see our response to your comment number 15.

CHEC-32

Please see our response to comment number 28.

CHEC-33

We disagree. No timber constraints were included in the amenity alternative. With the benefit values used, the allocation made by FORPLAN is the most cost efficient allocation. It is not correct to assume that steep slope areas or mixed conifer areas are always the least cost effective areas to manage. Some of these areas have very high volumes per acre. Even with higher costs and lower benefits, the benefits can still be higher than the costs.

CHEC-34

We disagree that the allocation is a budget allocation rather than a land allocation. There is considerable variation in the acreages allocated to various resource activities and the intensity in which various land areas are managed to produce resource outputs.

CHEC-35

Like the DEIS, the final EIS contains alternatives that include a wide range of land uses. The effects of these uses on unroaded areas is displayed. The FORPLAN model is used to systematically optimize the alternative objectives rather than putting in the constraints that you suggest. All alternatives are the most cost effective method of achieving the alternative objectives. This is the intent of the National Forest Management Act. While some of the lands included in the timber and livestock grazing base may not show benefits greater than costs, all contribute to increasing net public benefits and resolving issues.

Timber Yield Tables: The Gila National Forest used the RMYLD computer program to estimate future timber growth. CHEC has already questioned the use of RMYLD in its review of the Santa Fe Forest Plan.

While some of the problems with Santa Fe yield tables have been corrected for the Gila Plan, RMYLD still may greatly overestimate productivity because it assumes that all stands are capable of being fully stocked. The growth of stands in arid regions with limited stocking capacities may be highly overestimated.

Gila planners used an early version of RMYLD. More recent versions allow users to account for limited stocking capacity. Other programs, such as ECOSIM, may also account for stocking capacity problems if they are properly calibrated. Such calibration could be done by applying ECOSIM to older inventory data and comparing the results with recent growth as evidenced by the latest inventory data.

Another questionable aspect of Gila yield tables is the projection that volumes will increase by two-thirds or more with repeated thinnings. No western research has yet traced the growth of a stand over a full rotation. Most research which has been done indicates that thinnings can recover mortality and increase the diameter of trees in the final harvest, but that total growth is not appreciably increased.

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CHEC-36

The best available growth simulation model was used to develop timber yield information for the Gila National Forest. A number of different models were evaluated and compared. In 1981, when timber yield estimates for the Forest Plan were made, the following growth simulation models were evaluated: Rocky Mountain Timber Yield (RMYLD); STMES (ECOSYM); Ponderosa Pine Model (PIPO), PROGNOSIS, and hand calculations. ECOSIM and PIPO were unpublished and not yet approved for use. PROGNOSIS was not based on southwestern data. A revised version of RMYLD (RMYLD II) had not been developed at that time. After consideration of the relative advantages and disadvantages of each, RMYLD was selected as the best available model for use by the Gila National Forest.

The RMYLD Model was the best growth model available when the Gila timber yield tables and FORPLAN model were developed and were also based on Southwestern data. Growth, dwarf mistletoe, site index, and stocking data used in the RMYLD model were from plots located throughout Ponderosa pine forests of Arizona and New Mexico (including data from the Apache National Forest, part of which is included in the Gila Administrative Unit). The data used in RMYLD is described in Research Paper RM-87. The evaluation and use of RMYLD on the Gila is described in the Timber Analysis Technical Report, Gila National Forest, which is available at the Gila National Forest Supervisor's Office.

You expressed a concern with the effects of stocking on the yield tables and questions the projected volumes that result from repeated thinnings.

We feel that since some of the data for RMYLD calibration came from a proclaimed National Forest that is now part of the Gila Administrative Unit, stocking data within the model is adequate for projecting growth and yield on the Forest. The adequacy of the stocking control is substantiated by test run on other Forests in the Region. (Described later in this discussion)

In considering the projection of growth, it must be recognized that any yield model provides only an estimate. The question that must be addressed is whether or not the model results are reasonable. One way to verify if yields are reasonable is to compare the actual growth from inventory data to the growth and yield projections in RMYLD. The actual growth recorded in the last timber inventory for the Forest was 75.09 cubic feet per acre per year. The average yield for the Proposed Action Alternative displayed in the draft Environmental Impact Statement was 41 cubic feet per acre per year. The inventory yield is in incremental yield and not average yield, but it does indicate that the yields used in the Plan are reasonable and may even be conservative.

In your comment, you also suggested that the RMYLD data should be calibrated using ECOSIM. In doing so, you are suggesting the ECOSIM may be more appropriate for planning than RMYLD. Before ECOSIM was approved for use on Region 3 Forests, comparison tests were made on the Coconino National Forest which showed there was no significant difference between yields estimated with ECOSIM and yields estimated with RMYLD. Also, the Carson National Forest developed FORPLAN models using both simulators. The early model used timber yields developed using an early version of RMYLD and the more recent model used timber yield estimated using ECOSIM. The Maximize Timber Benchmarks from both models gave nearly identical results, clearly supporting the notion that both growth models give similar estimates of timber potential.

As a result of the facts presented above, we feel that the estimated yields provided by RMYLD are reasonable and there is no need to verify them through use of a model that has been proven to provide similar information.

Even-Aged Management The National Forest Management Act, which directed the Forest Service to begin forest planning, was passed in response to controversies over clearcutting. The Act specifically directs planners to determine if proposed clearcutting is optimal and other forms of even-aged management are appropriate.

A 20 January 1985 memo from the USDA Office of General Counsel to the Chief of the Forest Service suggests that the best way to make this determination is to develop an uneven-aged management alternative in the forest plans. Yet the Gila Plan does not include such an alternative, or even consider uneven-aged management in any great detail.

Page 28 of the Gila timber technical report states,

The Gila utilizes even-aged management for all timber species because 1) The harvest species respond well to this treatment; 2) total impacts on the land are less than with uneven-aged management due to the few number of entries; and 3) unit costs are lower due to reduced entries and higher volumes per entry.

This same statement can be found, almost word-for-word, in forest planning documents for other New Mexico forests -- for example, page 135 of the EIS for the Cibola Plan. Yet it does not appear to apply to New Mexico forests in general or the Gila in particular.

The dominant forest type on the Gila is ponderosa pine. According to Silvicultural Systems for the Major Forest Types of the United States (Agriculture Handbook 445, 1973), Southwest ponderosa pine "exists mainly as a climax forest in pure irregular uneven-aged stands. Past cuttings involved a variety of selection methods that tended to preserve the uneven-aged structure." Silviculturally, uneven-aged management is perfectly suitable in this forest type.

Uneven-aged management often calls for entries every 20 or more years. This is no more frequent than proposed in the Forest Plan, which calls for thinnings "on a 20 year cycle for the life of the stand" (EIS page 135).

The environmental impacts and costs of these thinnings would be no less than those for uneven-aged management.

Uneven-aged management may not be the best way to manage the entire Gila Forest. However, it may be the most appropriate method in areas of visual sensitivity or high-use recreation areas. It may even be more cost-efficient than proposed management regimes, since the average diameter of the timber removed would be greater, increasing value and reducing costs.

Gila planners should give more detailed consideration to uneven-aged management. One way to do this would be to develop an alternative which uses uneven-aged management as the predominant harvest method. Information gained from this alternative can be used to incorporate uneven-aged management into appropriate portions of other alternatives.

Combining Two Forests Section 13(a) of the Resources Planning Act, as amended by NFMA, directs the Forest Service to limit harvests on each national forest to less than the long-term sustained yield capacity of the forest. This is popularly interpreted as "nondeclining yield."

The section also limits the Forest Service from combining two national forests together for the purposes of computing such nondeclining yield levels unless one forest has less than 200,000 acres of commercial forest land. This provision was written in response to frequent combinations of "working circles," (areas on which the allowable cut is calculated) and the fact that when two working circles are combined the resulting allowable cut was often greater than the sum of the two separately.

Environmental groups, led by the Sierra Club, asked Congress to limit working circle size to the ranger districts. The Forest Service, which at the time was planning to combine the Wallows, Whitman, Umatilla, and Malheur Forests into one working circle, wanted no restrictions. As a compromise, Congress chose to limit working circle size to each national forest.

Although the Forest Service frequently combines two national forests into one administrative unit, such combinations have never been recognized by Congress. For example, when the Forest Service computes gross receipts to make the 25 percent disbursement to counties, it must do so using each proclaimed national forest, not each administrative unit.

CHEC-37

Both evenaged and unevenaged management systems were evaluated for Southwestern Forest types in the Southwestern Regional Guide. Regulation 36 CFR 219.9(a)(5)(i) requires that the Regional Guide prescribe appropriate harvest cutting methods to be used within the Region according to geographic areas, forest types, or other suitable classifications. Pinyon-juniper, Rocky Mountain aspen, Southwestern mixed conifers, Southwestern ponderosa pine, and Engelmann spruce-subalpine fir forest types were evaluated for the Southwestern Region. Silvical characteristics, shade tolerance, reproductive characteristics, existing stand structure, and incidence and susceptibility to insect, disease, and windthrow were all considered to determine appropriate management systems for each forest type (EIS Regional Guide, Appendix D). In most forest types, both evenaged and unevenaged management were considered appropriate in some circumstances. However, after all factors were considered, evenaged systems were selected as most appropriate for forest types in the Southwestern Region. (Regional Guide, page 3-12 through 3-15, FEIS Regional Guide, page 2-21 through 2-24).

The evaluation done for the Southwestern Regional Guide determined that unevenaged management is most appropriate for use in certain special management areas to meet Forest Plan objectives (Regional Guide, page 3-12 and 3-13). Since the required evaluation of appropriate management systems was done and resulting direction was published in the Regional Guide, there was no compelling need to re-evaluate appropriateness of evenaged management systems.

Although evenage management was determined to be appropriate to meet the objectives on most of the suitable timber areas on the Forest, unevenage management was found to be appropriate to meet wildlife goals and visual objectives in some areas. Unevenage management in these areas was simulated by maintaining 3 or 4 story stands with RMVLD. Acres of this type of vegetation manipulation were not included in the Draft Plan but have been added to the Vegetation Manipulation table in the Final Environmental Statement and Plan.

CHEC-38

The Gila Forest Plan was developed in accordance with National Forest Management Act implementing regulations 36 CFR 219.4 (b)(3) which requires that a forest plan be developed for each administrative unit of the National Forest System. We agree that different combinations of land areas could potentially affect some of the planning results. However, the plan will be implemented for the Gila National Forest unit and additional analysis of possible different management units is not relevant. Less than 63% of the tentatively suitable timber land on the Forest has been scheduled for timber harvest and different combinations of tentatively suitable lands would not have affected the harvest level.

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The Apache and the Gila are two separately proclaimed national forests. For administrative ease, the Forest Service combined the New Mexico portion of the Apache with the Gila and the Arizona portion of the Apache with the Sitgreaves. Yet, in Congress' eyes, they remain separate forests.

The portion of the Apache which is administered with the Gila has slightly less than 200,000 acres of commercial forest land. However, the Apache as a whole has considerably more than 200,000 acres, as does the Gila.

This combination would be particularly serious if the age classes of the Apache and the Gila complemented one another. If, for example, one Forest has a considerable number of acres of old-growth while the other has mainly second-growth, the programmed harvest of the two together is likely to be greater than the two calculated separately.

No reliable data on age classes of the two Forests is available. Table Two shows the number of acres in each of several FORPLAN classes, some of which roughly correspond to timber size classes.

The table indicates that there may be some complementarity between the two land bases. For its size, the Apache has much more pole/timber but minimal sawtimber. This means that the total programmed harvests can be increased by combining the two if harvests are first concentrated on the Gila. Harvests would shift to the Apache when Gila sawtimber supplies are exhausted and Apache poles are merchantable.

Table Two

Acres by Forest by FORPLAN Strata
Apache and Gila National Forests, New Mexico

Strata Description	Apache Acres	Gila Acres
Mistletoe-infected pine incl. pole & sawtimber	483	187
Sparsely-stocked pine incl. all size classes	17,997	54,126
Ponderosa pine poles	74,045	70,923
Ponderosa pine sawtimber	19,983	53,982
Ponderosa pine seedlings and saplings	16,450	19,761
Sparsely-stocked mixed conifer	45	744
Mixed conifer poles	23,314	35,580
Mixed conifer sawtimber	1,741	30,543
Mixed conifer seedlings and saplings	3,211	9,246
Totals	157,269	244,549

Planners should determine if this assessment is correct by making mini-FORPLAN models for the two Forests separately. If so, planners should seriously consider computing harvests on the two Forests separately for the final Plan.

Monitoring A major defect of the forest planning process is the weak monitoring programs which are invariably included with forest plans. The Gila Plan is no exception.

The Plan requires substantial investments in range improvements in order to increase range capacity. Yet the monitoring program does not require that grazing use be decreased if funding for those improvements is not made available. The Plan also requires substantial investments in reforestation and timber stand improvement. Yet the monitoring plan does not require that timber sales be decreased if funding for these activities is not available.

These and similar weaknesses in the monitoring program should be corrected. Monitoring should tie water quality, wildlife numbers, and other environmental indicators to commodity production. If, for example, water quality in an area declines beyond a predetermined level due to timber harvests or grazing, steps should be taken to reduce the decline through reduced commodity production or increased funding for soil and water improvements.

CHEC-39

The monitoring plan has been modified to reflect concerns expressed in several letters. Some of the changes that you request, however, are outside of the scope of the monitoring plan. The changes that you request for range, and timber would be equivalent to adding alternative Proposed Action Alternatives. If implementation of the plan is not possible because of funding problems, the plan will need to be amended. We feel that most other environmental factors have been adequately covered in the revised monitoring plan. The revised monitoring plan also indicates the variability that would initiate re-evaluation of plan implementation progress.

Conclusions

The EIS for the Gila Forest Plan has an extremely narrow range of alternative land allocations. No alternative considers removing high-cost timber lands such as roadless areas, steep slopes, low sites, and low-valued forest types from the timber base. No alternative considers reducing the land base for livestock grazing. No alternative considers non-timber, non-roaded allocations for the roadless areas.

The preferred alternative includes a number of programs which are extremely inefficient and difficult to justify on the basis of maximizing net public benefits. Sales of timber from steep slopes increases management costs and reduces Federal and county revenues. Raising grazing capacity to 10 percent above current levels costs an enormous amount of money for a minimal return.

Planners should make major revisions to the EIS and Forest Plan to correct these deficiencies. Values for timber, grazing, and recreation should be revised. Prescriptions specifically designed to protect roadless values should be developed and suitable roadless areas identified. Timber yield tables should be carefully reexamined.

A wider range of alternatives should include uneven-aged management as well as various land allocations. At least one alternative should attempt to maximize present net worth by eliminating steep slopes, commercial thinns, and other high-cost or low-valued timber from management. The preferred alternative should include inefficient practices such as cable logging and range improvements only if it can be shown that the benefits of such practices exceed the costs.

LETTER 1-GF

FOREST SERVICE RESPONSE TO LETTER 1-GF

GOVERNOR
TUNNEY ANAYA
DIRECTOR AND SECRETARY
TO THE COMMISSION
HAROLD P. OLSON

State of New Mexico



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REC'D

September 25, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

My agency's comments do not necessarily represent, nor should they be construed as constituting, the official State position on the Gila National Forest Plan. Nonetheless, I appreciate you affording the New Mexico Department of Game and Fish the opportunity to review and comment on the proposed Gila National Forest Draft Environmental Impact Statement (DEIS) and Forest Plan. The Department's comments pertaining to the DEIS are of a general nature and are outlined below. Comments pertaining to the proposed plan are more specific and are discussed in the attachments to this letter.

Monetary values for fish and wildlife used in the formulation of the various alternatives in the DEIS and in the formulation of the Forest Plan are much too low. These values reflect a continuing under evaluation of these resources. Because of this, wildlife programs are at a disadvantage throughout the entire planning process because they cannot compete on a dollar-for-dollar basis with other interests, such as timber (the values of which are inflated when compared to actual market values) and livestock.

Other problems stem from the fact that the New Mexico Department of Game and Fish interprets the phrase "multiple use" somewhat differently than the U.S. Forest Service. We assume, for example, that multiple use implies that wildlife considerations should be just as important as other interests. To this end, we are often not satisfied with what we perceive to be an undue emphasis being placed on the allocation of such items as forage to livestock or the construction of many miles of roads for the harvest of timber, both of which are "justified" on the basis of economics.

1-GF-1

In your comment, you state that monetary values for fish and wildlife are much too low. You do not, however, substantiate the statement with evidence, documentation, alternative values, or alternative methods of calculating wildlife benefit values. As a result we can only assume your intent.

We assume that you feel that benefit values should be based on an expenditure or end user basis. We do not agree that an expenditure basis is the correct way to value resource outputs. Valuation of dollar resource outputs, on an expenditure basis, would increase benefit values. However, it would increase all values, not just wildlife. The correct basis for valuation of all outputs in forest planning is on-site, without additional processing. This was the approach we used. All outputs were valued at the same point in the production process.

We disagree with your comments regarding the comparability between timber benefits and recreation benefits. The benefit values used for timber were calculated based on the statistical high bid plus purchaser credit -- in other words, it is the actual amount of money the timber buyer pays for stumpage. The benefit values used for recreation are based on those used in the 1980 National FPA analysis process. The benefit values for recreation are based on the economic concepts of "net willingness to pay" or "consumers surplus." Simply stated, the recreation benefit values are based on the consumer's willingness to pay over and above his round trip expenses of actually going to the Forest for the recreation experience. Expenditures (which may be quite high) are actually costs and are subtracted from "total willingness to pay" to arrive at benefit values. This is similar to the logic of timber valuation -- that is, the cost of harvesting, skidding, loading, etc., is not counted as part of the benefit value of timber. We believe that in most instances, the valuation concepts are comparable (for a technical evaluation of these concepts, see: Loomis, J.B. and J.G. Hof, Comparability of Market and Non-Market Valuations of Forest and Rangeland Outputs, Research Note RM-457, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado, October 1985).

1-GF-2

We agree that different interpretations of multiple use are possible. Each special interest group interprets multiple use in a way which favors their own interests. The New Mexico Department of Game and Fish's special interest is wildlife populations, and it is natural that you would interpret multiple use to favor wildlife populations. The Forest Service's interpretation, however, is based on the definition of multiple use contained in the Multiple Use Sustained Yield Act of 1960 (MUSYA). This act defines multiple use as:

"...the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output." [Emphasis added],

As can be seen from the definition quoted above, multiple use does not necessarily mean equal budgets, equal values, equal acreages of emphasis, maximizing of one resource at the expense of others, or that all resources will receive equal attention on every acre of land in the National Forest.

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FOREST SERVICE RESPONSE TO LETTER I-GF

System. The key point in the definition of multiple use is that resources are to be utilized in combinations to meet the various public needs and that management of resources will be coordinated and harmonious. We believe the Forest Plan prescribes coordinated and harmonious management of all resources because we, in fact, do consider wildlife as important as other resources. Every prescription contained in the Forest planning model was an integrated multiple use prescription which considers all resources, including wildlife. Prescriptions in the Forest Plan contain standards and guidelines for the integration of all resources.

It is true that some resources are emphasized over others in some areas. However, emphasis is never carried to the point where nonemphasized resources are excluded or their productivity significantly impaired. For example, wildlife was emphasized above current levels in 20 of the Forest's 38 management areas. On some areas, wildlife was the primary emphasis, on others it shared emphasis with various combinations of timber, range, and recreation. On the other hand, wildlife was maintained at current levels on the other 18 areas in difference to other resource values and needs.

Wilderness was emphasized over wildlife values (and all other resource values) in the wildernesses discussed in the plan. Obviously there is a tradeoff between wilderness values and wildlife values in these areas, just as there is a tradeoff between developed recreation and wildlife values in other areas. Wildlife tradeoffs exist between many resources. Management tradeoffs even exist between species. All of these tradeoffs were considered, not just trade-offs between timber harvest and wildlife, or grazing and wildlife.

1-GF-3

We continue to disagree with conclusion that concurrent review periods for Draft Environmental Impact Statements and Proposed Forest Plans violate Federal statutes and discourage meaningful public participation. In our opinion, the opposite is true. There are a number of regulations which support our procedure. In addition to the procedure being legally mandated, there is good rationale behind our procedure, and we believe it provides the public a meaningful opportunity to understand and influence future management of the Forest.

Environmental Impact Statements and Forest Plans are distinct documents prepared in accordance with different laws and regulations. Both documents have legally mandated public review requirements. Environmental Impact Statements are prepared in accordance with the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) [40 CFR 1500-1508]. Forest Plans are prepared under the regulations for National Forest System Land and Resource Management Planning [36 CFR 219]. The NEPA regulations require that environmental impact statements be available for public review for at least 45 days [40 CFR 1506.10(c)]. The National Forest Management Act requires that proposed Forest Plans be available for public review for at least 3 months [16 USC 1604(d)]. The planning regulations require both public review periods be at least 3 months and that they run concurrently [36 CFR 219.10(b)]. The planning regulations also require that a single process be used to satisfy both NEPA and planning requirements [36 CFR 219.12(a)].

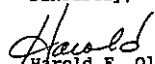
In addition to the requirement to have concurrent review periods in 36 CFR 219.10(b) and 36 CFR 219.12(a), NEPA regulations provide for concurrent reviews in several places. Section 1500.2(c) requires that NEPA requirements be integrated with other planning and review requirements and that procedures will run concurrently rather than consecutively. Section 1501.2(b) reiterates that environmental documents be circulated and reviewed at the same time as other planning documents. Section 1502.25(a) again states that environmental impact statements should be concurrent with products and requirements of other laws and regulations. Finally, Section 1506.4 provides for combining documents.

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While comparative values and the meaning of "multiple use" are important issues, another concern is the presentation of a defacto Forest Plan in advance of public review and comment on the DEIS. The DEIS and Forest Plan are mandated under guidelines established by the National Environmental Policy Act (NEPA), the Forest and Rangeland Renewable Resources Planning Act (RFA), and the National Forest Management Act (NFMA). The purpose of the DEIS is to analyze and assess environmental impacts associated with alternative courses of action or management strategies. This information is then to be provided to the public for their participation. The public input arising from this process should then be used in formulating the Forest Plan. Unfortunately, the approach outlined here is not the one that is being followed in this region of the Forest Service, although I believe that it should be followed.

In closing, I should emphasize that I am working with some success to resolve specific problems at the Regional level on a forest by forest basis. My general comments expressed in this letter reflect my dissatisfaction with the U.S. Forest Service's overall approach to the planning process, which is largely beyond the control of a given forest.

Sincerely,


Harold F. Olson
Director

whb

Att. 9 pages

cc.: Daniel Lopez (Secretary, Dept. Finance & Administration)
Leo Griego (Secretary, Natural Resources)
Susan Tixler (Office of Policy Analysis)
Craig Nordyke (NMGF Southwest Area Supervisor)

Even if concurrent review were not mandated by law, it is a logical approach.

To understand the rationale, it is necessary to view the documents separate from the analysis process preceding them. A number of alternatives were analyzed. These alternatives are different proposed forest plans which were all fully developed and analyzed. Each alternative is a combination of choices made from a wide range of prescriptions and timing options. The alternatives were evaluated on how well each maximized net public benefits. Once analysis and evaluation were completed, one alternative was selected as the Forest Service Preferred Alternative or Proposed Forest Plan.

Once the preferred alternative was identified, the environmental impact statement was prepared to disclose environmental consequences associated with the preferred alternative and all other alternatives. The intent of the environmental impact statement is to provide full and fair discussion, comparison, and evaluation of the preferred alternative and all other alternatives. This was accomplished in the Gila National Forest Plan Environmental Impact Statement.

On the other hand, the Proposed Forest Plan was prepared to provide the details on how, when, and where the proposed plan could be implemented. The Forest Plan translates the results of analysis into integrated management direction in a readable format for specific geographic locations.

We believe the public is mainly interested in what is being proposed in specific locations and how management on the ground will actually be carried out if the proposed plan were implemented. The Proposed Forest Plan provides this information while the Environmental Impact Statement provides information on environmental consequences on a forest-wide basis. Both are necessary for the public to make informed comments.

Based on the volume and quality of comments we have received, public participation has not been discouraged. Many changes have been made in the environmental impact statements and proposed plans. We have found that specific comments on proposed plans are very constructive and help us to be responsive. However, without information that sheds new light on analysis and evaluation of alternatives, voting on alternatives is of little value. On the other hand, working toward a more implementable plan is very productive. Circulating proposed plans, along with the environmental impact statements, helps focus on getting the best possible plan implemented on the ground.

PROPOSED forest plans are the result of analysis and evaluation of several plans documented in a DRAFT environmental impact statement. Therefore, these are not "de facto" plans. They are not final and many significant changes are being made in response to public comments.

In summary, we believe there are legal and sensible reasons for the review procedure, and that productive public comment has been fostered rather than hindered.

LETTER 1-GF

FOREST SERVICE RESPONSE TO LETTER 1-GF

1-GF-4

The following comments pertaining to the Gila National Forest Plan are presented according to subject matter. There are many portions of the Plan that the New Mexico Department of Game and Fish supports. There has not, however, been sufficient time or space to convey those portions of the plan that are supported. The following comments therefore emphasize only those portions of the plan the Department considers to be ambiguous, deficient, or positions we simply cannot support.

FORAGE ALLOCATION

In the planning process I know that a certain amount of forage has been allotted to wildlife, but the amount "guaranteed" through minimum constraints is not stated. In management area 4B (page 129) for example, the Plan states that permitted livestock use in this area will decline only slightly while wildlife AUMs will remain at their present level of 4,000 units. Given that livestock AUMs will remain at a level of approximately 33,650 AUMs, shouldn't wildlife get a greater and fairer share of the available forage? Without knowing what the minimum standards that are "guaranteed" or used as "side board constraints" in the planning process, it is impossible to reconcile this discrepancy. Under multiple use, wildlife should be entitled to at least an equal share of the available forage.

There are many other areas of the plan where this perceived discrepancy is equally disturbing. Those areas that are most disturbing include the following:

Page 54 - Unit 2A - Livestock	23,506	Wildlife	1,850
Page 63 - Unit 2C - Livestock	4,198	Wildlife	484
Page 67 - Unit 2D - Livestock	3,000	Wildlife	1,500
Page 72 - Unit 2E - Livestock	4,372	Wildlife	1,200
Page 79 - Unit 2F - Livestock	11,273	Wildlife	1,480
Page 84 - Unit 2G - Livestock	6,356	Wildlife	1,022
Page 114 - Unit 3D - Livestock	23,173	Wildlife	1,683
Page 138 - Unit 4C - Livestock	22,757	Wildlife	3,600
Page 157 - Unit 5B - Livestock	16,095	Wildlife	2,160
Page 165 - Unit 5C - Livestock	34,800	Wildlife	3,156
Page 174 - Unit 5D - Livestock	11,237	Wildlife	1,000
Page 179 - Unit 6A - Livestock	10,481	Wildlife	838
Page 186 - Unit 6B - Livestock	26,352	Wildlife	5,141
Page 195 - Unit 6C - Livestock	17,301	Wildlife	5,037
Page 209 - Unit 7A - Livestock	10,477	Wildlife	2,638
Page 259 - Unit 9A - Livestock	9,015	Wildlife	759
Page 264 - Unit 9B - Livestock	12,032	Wildlife	2,030
Page 270 - Unit 9C - Livestock	2,160	Wildlife	724

TOTALS. 248,585 36,302

I have no problem with management area 2H (pages 90-91), but I am curious as to why this is one, if not the only, area within the Plan that balances livestock AUMs (1,292) and those allotted to wildlife (1,220). This demonstrates that the disproportionate allocations seen above can, and should, be brought into closer agreement.

You state that multiple use means wildlife and livestock forage capacities should be divided equally. As we pointed out in comment 2, multiple use is not defined as equal shares for each resource. There obviously needs to be harmonious integration of wildlife and livestock needs; however, your claim that integration occurs when forage capacity is split 50/50 is unsubstantiated. No data source has been cited which would indicate that a 50/50 ratio is any more correct than the estimates in the Forest Plan. Furthermore, a 50/50 ratio may not be required at all to achieve the goals in the New Mexico Department of Game and Fish's draft comprehensive plan.

The habitat capability estimates in the plan are based on our best estimate of existing wildlife populations using data provided by NMDGF, grazing permits, and Forest Service personnel. Existing population estimates were then converted to WAUM'S using forage conversion factors from research literature with additional allowances estimated for nongame species. Goals and objectives in the plan considered big game population goals in NMDGF's existing New Mexico Comprehensive Plan. Through coordination efforts with several biologists from your agency, we have considered your more recent goals and objectives from the Draft Comprehensive Plan in the preparation of the modified plan. NMDGF has participated and provided input throughout this process.

We did make an error in calculating the WAUM'S in the draft plan. An incorrect conversion factor was used for deer and nongame species. The WAUM'S have been recalculated using the updated conversion factors. The updated conversion factors used were taken from research literature and reviewed with personnel of the NMDGF. The updated conversion factors are as follows.

PRIMARY LARGE HERBIVORES - (Big game species with population estimates available)

ELK - [population estimate] X 0.5 [average elk/cattle AUM overlap] X 12 month period = Elk WAUM estimate [Example: 100 Elk X 0.5 X 12 months = 600 WAUM'S]

DEER - [population estimate] X 0.2 [average deer/cattle AUM overlap] X 12 month period = Deer WAUM estimate [Example: 100 deer X 0.2 X 12 months = WAUM'S]

ANTELOPE - [population estimate] X 0.1 [estimated antelope/cattle AUM overlap] X 12 month period = Antelope WAUM estimate [Example: 100 antelope X 0.1 X 12 months = 120 WAUM'S]

BIG HORN SHEEP - [population estimate] X 0.1 [estimated Big Horn/cattle AUM overlap] X 12 month period = Big Horn WAUM estimate [Example: 50 Big Horn X 0.1 X 12 months = 60 WAUM'S]

ALL OTHER SPECIES - Nongame and other game species associated with forage/cover use relationships:

Riparian/Aquatic Zones - Riparian/aquatic acreage X average estimate of other species forage use associated with current riparian condition [conservative average factor 0.3]. [Example: Riparian/aquatic acreage = 100 acres X 0.3 = 33 WAUM'S]

Mixed Conifer, PP, PJ, MG, PG, DS Zones - Vegetation type acreage X average estimate of other species forage use associated with current vegetation type condition [Conservative average factor 0.01]. [Example: MC, PP, MG acreage = 10,000 acres X 0.01 = 100 WAUM'S]

For management area 3B (page 102), the plan states that permitted livestock use will stabilize by the end of the fifth decade at approximately current levels. In the same paragraph, however, the Plan indicates that wildlife habitat capability will increase by 64% by the fifth decade. This means that wildlife will increase from 1,390 AUMs to roughly 2,280 units by the fifth decade. By the end of the fifth decade, livestock AUMs will still be 3,324 units. Even with prescribed fire and additional watering units, can you have livestock remain the same and still have a 64% increase in wildlife? Theoretically, I suppose the answer is yes, but the Forest Service will have to do much more than it has if it hopes to accomplish this objective.

Throughout the Plan, under the heading "Management Emphasis", the statement is made that permittee investment can be used to partially sustain permitted numbers at some level above that indicated for the fifth decade if conflicts with wildlife can be avoided. Some conflicts can certainly be avoided but many will remain. However, given the vast acreages of land that are in unsatisfactory condition and the disproportionate allocation of forage to livestock, is this really an appropriate course of action?

On page 93 of the Plan, the statement is made that wildlife improvements will be constructed where needed to maintain the reduced level of habitat. I am not sure that the loss of habitat or even large increases in habitat can be accomplished in many instances through construction projects aimed at improving wildlife habitat. The fact remains that no matter how many watering units or how many miles of fence are built, if an area is too small (either geographically or by virtue of various human disturbances) to support a given herd of deer or elk, then these improvements will not produce significant increases in wildlife habitat.

Management area 3C (page 108) provides a similar example of what I believe are unrealistic expectations. The emphasis for this area is to significantly increase the quality of wildlife habitat. The Plan calls for a 76% increase for wildlife with only a 10% decrease for livestock. Such a large increase for wildlife in conjunction with a relatively small decrease for livestock seems unrealistic. I doubt that there is anything, including the use of prescribed fire, that the Forest Service can do that would produce results of the magnitude being claimed.

The Plan fails to recognize and thus address the fact that much of the so called "forage" that is allocated is used, especially by many nongame species of wildlife, as cover and not forage. Therefore, to simply allocate forage on the basis of game species and livestock fails to address the multiple use of these resources. Forest plans and other such documents need to figure this into their planning process, or if this is already done, a way of conveying this (including the methodology used) to the average reviewer.

The revised WAUM figures are shown in the final plan and show that presently they are about 112 MWAUM's, which is about 22 percent of the total. In other words, the present ratio of livestock/wildlife forage allocation is 78/22. Present wildlife population levels are below the goals in the NMDGF's draft Wildlife Comprehensive Plan. The Forest Plan responds to these goals by providing for increasing the wildlife allocation to achieve more of NMDGF's goals. NMDGF's goals are in draft form and may change, but are the best information available to us in preparing the final plan.

The Forest Plan calls for an increase to about 146 M WAM's. The allocation ratio will change to 71/29. NMDGF's goals will not be totally met at the Forest Plan level of 146 M WAM's. According to the best data we have available, approximately 163 M WAM's would be needed to fully meet NMDGF's big game species. This would be a ratio of 69/31. Information on draft goals for non-game species were not available, but it is doubtful that the added forage requirements would result in the 50/50 ratio in your comment. We feel that the increase projected in the modified plan, while not at the level needed to 100 percent satisfy draft New Mexico Wildlife Comprehensive Plan goals, provides for meeting significant portions of these goals while still providing for high levels of other multiple uses. [The draft goal information we have is based on coordination efforts with several New Mexico Department of Game and Fish biologists. We realize these are draft goals and may change, but this is the best information we have for comparing your goals with plan accomplishment.]

1-GF-5

As pointed out above, the WAUM estimates have all been recalculated. The correct figures for Management Area 3B are 2426 existing WAUM's that increase to 3361 WAUM's. This is a 38 percent increase. The best data available indicates that this increase is feasible.

1-GF-6

We believe it is appropriate for permittees to benefit from their investments to sustain permitted numbers, so long as all other objectives for the area can also be achieved, including wildlife objectives. There are a number of cases where additional investments or intensified management will result in increased forage capacity but where the Forest is unable to provide the funds. The permittees would have the opportunity to make these investments if they believe the benefits outweigh their cost and as long as other multiple objectives can be met.

1-GF-7

The revised figures for Management Area 2H show that WAUM'S increase from 795 to 1075. The planned habitat improvement projects will help achieve the projected increase. This Management Area is over 32,000 acres in size and we believe that it is large enough to support planned wildlife populations.

1-GF-8

This area is a highly productive elk habitat, and based on our past observations of elk population responses, we believe that the estimates in the final plan are achievable.

1-GF-9

The Plan has recognized the forage/cover need of nongame species. As was pointed out in comment 4, factors were used to estimate a nongame component of the total WAUM's. Approximately 49,000 WAUM's have been allocated to nongame species in the Forest Plan.

RANGE AND GRAZING ALLOTMENTS.

The Gila Forest is to be commended with respect to the stance it has taken to reduce the impacts of livestock grazing on the forest ecosystem. I am curious, however, as to how permitted use will be balanced with capacity by the end of the second or third decade. The Plan implies that this will be accomplished to a large degree by reducing stocking rates on numerous areas. All too often when the Forest Service states that capacity will be balanced with permitted use, what is really meant is that the Forest Service will create more grasslands via timber harvest, with very little reduction in livestock ADUs. Controlled burning will also have the effect of turning forested and brush lands into grasslands. There is nothing wrong with this so long as it is done in an environmentally prudent manner and that subsequent to this, permitted use by livestock is not dramatically increased. Will permitted use really be balanced by reductions in livestock stocking rates, or will the Forest simply create more grasslands?

Page 35 of the Plan provides a table that describes the three levels of management intensity that are to be applied to management areas within the Gila National Forest. Level B is the least intensive, Level C of moderate intensity, and Level D provides the most intensive management (e.g., allotments are inspected every year). Given that management Level D is the most intensive, then it seems only logical that this level of management would be especially suited to those areas of the forest having the poorest range conditions. Unfortunately, the Forest Plan in far too many instances does not follow the logic of this argument. The following serves to illustrate my point.

Page 52	- Unit 2A	- 65% unsatisfactory	- Level C
Page 70	- Unit 2D	- 40% unsatisfactory	- Level B
Page 87	- Unit 2G	- 43% unsatisfactory	- Level C
Page 99	- Unit 3A	- 85% unsatisfactory	- Level B
Page 105	- Unit 3B	- 50% unsatisfactory	- Level C
Page 111	- Unit 3C	- 40% unsatisfactory	- Level B
Page 125	- Unit 4A	- 60% unsatisfactory	- Level C
Page 154	- Unit 5A	- 63% unsatisfactory	- Level C
Page 199	- Unit 6C	- 63% unsatisfactory	- Level B
Page 206	- Unit 6D	- 67% unsatisfactory	- Level B
Page 231	- Unit 7E	- 50% unsatisfactory	- Level B
Page 239	- Unit 7F	- 79% unsatisfactory	- Level B
Page 284	- Unit 9E	- 45% unsatisfactory	- Level B

In addition to the former, in many areas where management Level D is recommended, there will still be far too many acres left in unsatisfactory condition by the end of the fifth decade. For example, in management area 2B there is presently 49,792 acres of the total 158,908 acres classified as full capacity rangelands in unsatisfactory condition. Management Level D is recommended, but by the end of the fifth decade, the plan indicates that there will still be 38,978 acres in unsatisfactory condition. Surely the Forest Service can reduce this even more by the end of the fifth decade. A similar example is found on page 76 of the Plan (area 2E). In this case, over 65% of the lands are currently unsatisfactory and even with Level D management, there will still be over 45% of the 48,450 acres in this area in unsatisfactory condition by the end of the fifth decade. Again, this would seem to be an exceptionally large amount of land to still be in such condition at the end of the fifth decade.

The Plan contains a few errors here and there, which are to be expected of such a large document. However, in a few instances these errors are important enough to be pointed out. A case in point is on page 161 of the Plan (area 5B). The figures given for lands classified as full capacity rangelands are either incorrect or else the figures given for the total acres of unsatisfactory habitat are incorrect.

1-GF-10

The methods that will be used to balance grazing capacity and use are not merely implied in the Plan and EIS, they are clearly stated. Balance will be achieved by a combination of reducing numbers and increasing capacity through improved management. This was first mentioned on page 19 of the DEIS under the description of the Proposed Action. The simultaneous reduction in numbers and increase in capacity are again demonstrated in Tables 2 and 3. Another description appears in the range section of the DEIS Chapter 4.

You have also made an erroneous assumption that timber lands will be converted to grassland to increase capacity. There are no management practices designed to create grasslands in the Forest Plan. Normal regeneration harvests will result in minor amounts of transitory grazing capacity, but projected capacity increases were not based on large increases in transitory capacity. The increased capacity estimates are primarily a result of improved management, i.e. rest rotation and additional improvements such as fencing and water developments.

Also, controlled burning will not result in creation of grasslands. A prescribed burn does not burn with enough intensity to convert a site from one vegetative type to another. Mature trees are rarely killed in a prescribed burn.

1-GF-11

There is no direct cause and effect relationship between existing range condition and the intensity level of range management.

Range management intensity level is an expression of how the livestock are managed. Any of the management intensity levels can be applied to rangeland in satisfactory or unsatisfactory condition. All management intensity levels are designed to balance permitted use with grazing capacity and to improve range condition to fair or better. Higher levels of management intensity generally result in higher capacities, while lower management intensity levels have relatively lower capacities. Higher intensity levels also generally result in higher costs. On these higher intensity management areas, grazing use is brought in line with capacity at least partially by increasing capacity. Balancing grazing use and capacity on low management intensity level areas is normally accomplished by reductions in numbers. Unsatisfactory range condition can be improved by increasing capacity or reducing permitted numbers to the existing capacity. The plan calls for increasing capacities on the most cost effective areas.

Therefore, it is incorrect to assume that Level B or C management will cause or perpetuate unsatisfactory range condition. Properly stocked Level B or C allotments can be as effective in improving range conditions as the more intensive levels of management.

1-GF-12

We agree. An extra digit was added. The plan has been corrected to read 7,256 acres of unsatisfactory range condition.

1-GF-13

USE OF WILDLIFE FUNDS FOR RANGE IMPROVEMENTS:

Throughout most of the Gila National Forest Plan, under the heading "Management Emphasis", reference is made to the use of wildlife funds for making range improvements. In general, the statement that is made indicates that where permitted livestock use has declined to a point where some improvements necessary for wildlife are not being maintained from range funds, then wildlife funds will be used for maintenance or reconstruction in such areas. At face value there is nothing particularly objectionable to this, so long as the use of these funds are not abused. However, what happens once these improvements have been made, will not the various permittees then begin to pressure the Forest Service into increasing livestock stocking rates?

I am not suggesting that some mutual benefits will not, and currently do not, result from the creation of improvements such as watering holes, nor do I object to an occasional sharing of responsibilities. There is the potential, however, for abuse of wildlife funds. Perhaps in a worse case scenario, wildlife funds could be used to subsidize a local rancher. Indeed a case can, and will undoubtedly be made, that this is exactly what currently maintaining livestock improvements with range funds is doing for wildlife. The fundamental flaw in this argument, at least from where the Forest Service should be coming from, is the fact that wildlife is native. Under Forest management, and indeed under multiple use management, wildlife should be accorded a certain "priority" or at least parity with livestock.

I found it interesting that only rarely (perhaps no more than twice), did the Plan state that funding will be proportional to the importance of the improvements to wildlife and the percent use by range (see page 195); use when, now or in the future? Does this mean, or could this not be construed to mean, that improvements made solely for wildlife could subsequently be used predominantly by livestock should the Forest elect to increase a permittee's allotment? How would this affect the Forest Service's position that allows for permittee investment to be used to partially sustain permitted numbers at some level above that indicated for the fifth decade if conflicts with wildlife can be avoided?

Wildlife will often utilize and even benefit from range improvements made primarily for livestock. Such improvements are, however, rarely critical to the survival of wildlife. On the other hand, most range improvements are essential to the survival or management of livestock. Livestock producers for this reason have traditionally, and must continue, to bear the brunt of the funding costs for such improvements. I do not object to the use of wildlife funds to maintain improvements essential for wildlife, nor do I object to the reasonable use of these same facilities by livestock, so long as use by the latter does not preclude or significantly detract from the use of these improvements by wildlife.

PREScribed FIRE

Several species of wildlife should benefit from the judicious use of prescribed fire. For this reason, I do not object to the Gila National Forest's plans to utilize prescribed fire as a management tool. The Plan places too much emphasis, however, on this type of management with respect to improving wildlife habitat. For example, on pages 249 and 246 (as well as many other management areas), a large percentage of the stated improvements in wildlife habitat are attributed to the implementation of the Gila prescribed fire program.

Use of prescribed fire is not a panacea, it is only one of many tools the Forest Service should use to improve wildlife habitat. Throughout the Plan, however, the reader gets the

We disagree that the Plan suggests improper use of funds. The plan is clear, as you noted, that wildlife funds will be used to maintain existing range improvements which would be beneficial to wildlife but are no longer needed to meet grazing objectives. This is an appropriate and beneficial use of funds. While it may be true that survival of wildlife species is not dependent on range improvements, range improvements, particularly water developments and cross fencing, have increased the habitat capability of the Forest and are essential in working toward NMDGF's wildlife population goals.

1-GF-14

You state that the use of prescribed fire is excessive and that wildlife habitat improvements due to prescribed burning have been inflated. You then question the validity of the rest of the Plan because of your erroneous assumption about prescribed burning.

We are puzzled by these comments because, while extolling the merits of prescribed burning, you question the sincerity of the Forest's burning program. Except for wilderness areas, prescribed burning was not a significant factor in projecting wildlife increases. Prescribed burns were but one tool in an overall habitat improvement program. We believe that the projected gains are achievable.

The following table displays the annual acres proposed for burning by management area.

MA	ACRES/YR.	MA	ACRES/YR.
2A	11	8A	30
2B	10	8B	60
2C	1	8C	20
2D	2	8D	11
2E	2	7A	15
2F	10	7B	0
2G	2	7C	0
2H	20	7D	10
3A	120	7E	5
3B	100	7F	15
3C	70	7G	21
3D	100	8A	21
4A	12	8B	20
4B	20	8C	62
4C	20	9A	10
4D	7	9B	10
5A	20	9C	5
5B	10	9D	20
5C	10	9E	10
5D	10		

As the above table shows, Management Area 8A, which was cited by NMDGF, will have only 20 acres per year of prescribed burns for habitat improvement. Management Area 3A has the highest acreage burned for habitat improvement with 120 acres per year. These acreages hardly seem excessive. In wilderness areas, burning is about the only management activity that can result in habitat improvement. In wilderness these benefits are expected from burning programs designed to improve the wilderness resource.

LETTER I-GF

impression that the vast majority of habitat improvements for wildlife are either directly or indirectly attributed to prescribed burning. Because I feel that the benefits to wildlife resulting from the use of prescribed fire have perhaps been over estimated, I feel that many of the gains being projected for wildlife are also perhaps overstated.

If I am indeed correct in my assessment that many of the projected gains are somewhat inflated, then many of the projections used in formulating other portions of the Plan are perhaps in error. For example, if livestock grazing capacity is predicated in part on projected improvements in both wildlife and livestock habitats, and these projections are inflated, then the resulting availability of resources and the subsequent allocation of resources such as forage may also be incorrect. The crux of my argument is that resources are finite, and to allocate say 50% to one group and the other 50% to another, when realistically there is perhaps only 60% of the projected resource actually available, means that neither livestock or wildlife benefit. The Gila National Forest should make every effort to insure that projected improvements in livestock and wildlife habitats are indeed realistic. I understand the degree of difficulty, if not the impossibility, involved in making such projections truly accurate. However, given the degree of difficulty and the insufficient data base on which to make such predictions, a more moderate if not conservative, set of projected improvements in wildlife habitat seems in order. Concurrently, greater reductions in forage allocations to livestock are perhaps appropriate.

ROADS

The following excerpt from page 122 of U.S. Department of Agriculture Forest Service Handbook No. 553, Jack Ward Thomas (tech. editor) serves as an excellent introduction and sets the stage for my comments concerning roads in the Gila National Forest.

"The effectiveness of deer and elk habitat in obtaining optimum use of the maximum area is adversely influenced by the presence of roads that are open to vehicular traffic. This effect is markedly influenced by the type of road, its location, and degree of use. Researchers have reported decreased use of areas adjacent to roads for distances ranging from 0.4 to 0.8 kilometer (0.25 to 0.50 mi)."

In other words, the number of miles of open (traveled) road per square mile of habitat and the intensity of their use has a significant impact on wildlife populations, not to mention the increased sediment load poorly constructed or maintained roads contribute to our lakes and streams. With this in mind, my comments regarding roads in the Gila National Forest are presented in the following paragraphs.

In order to properly evaluate the effects of road construction and maintenance upon wildlife and its habitat, one needs to know the density of roads within an area. Simply giving the reader the number of miles, which is all the Gila National Forest Plan does, tells me very little as far as the potential effects upon local wildlife populations. In addition, as mentioned above, the intensity of use (at least a best estimate) should be provided. The Gila National Forest Plan provided neither density figures or estimates as to intensity of use, i.e., primary, secondary, or tertiary road classifications. The Plan does not totally fail to recognize the importance of providing these data, however, as the plan raises the issue under the sections coded as C15, L01. Unfortunately, all that is said is that "during transportation planning, road and trail densities will be evaluated within the key habitat areas." I understand this statement but it still

1-GF-15

We agree. Additional road density information has been added. Also, the miles of new road construction have been significantly reduced. These changes are reflected in the EIS and the Forest Plan and are summarized in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

LETTER I-GF

FOREST SERVICE RESPONSE TO LETTER I-GF

does not provide the data that I need to assess the potential impacts of roads upon wildlife. Furthermore, the statement raises another issue that concerns road and trail densities in areas that are not specified as key habitat areas. I understand the need to prioritize various areas, but the Gila National Forest must recognize that many species of wildlife utilize areas that are not designated as key habitat areas and thus the density of roads in these areas is still of concern.

The former comments specifically refer to the following sections of the Gila National Forest Plan. Other sections of the Plan fail to provide the necessary data, but the number of miles of road are generally very limited and thus I will assume that road densities and use are of acceptable levels. Those sections of the Plan where such an assumption is not possible, given the lack of data, include the following

Page 60 - Unit 2B	Page 184 - Unit 6A
Page 100 - Unit 3A	Page 192 - Unit 6B
Page 106 - Unit 3B	Page 200 - Unit 6C
Page 112 - Unit 3C	Page 207 - Unit 6D
Page 119 - Unit 3D	Page 240 - Unit 7F
Page 126 - Unit 4A	Page 263 - Unit 9A
Page 155 - Unit 5A	Page 269 - Unit 9B
Page 171 - Unit 5C	Page 274 - Unit 9C
Page 178 - Unit 5D	Page 279 - Unit 9D

ENDANGERED AND THREATENED SPECIES

Throughout the Gila National Forest Plan, under codes C01, C05, and C08, the Forest Service states that it will continue to improve threatened and endangered species habitats through approved recovery plans. This is fine for Federally listed species, for which there are existing recovery plans or other special interagency agreements such as 16-R3-85-0019, but the Plan fails to address how the Forest Service intends to manage for State-listed threatened and endangered species (both plant and animal).

Management of State-listed species is occasionally accomplished through cooperative agreements between the U.S. Forest Service and the New Mexico Department of Game and Fish. In the vast majority of instances, however, such species are managed through administrative guidelines established in each of the National Forests. Given this, the Gila National Forest should expand upon its discussion of threatened and endangered species, particularly in regard to State-listed species. The Plan should first state what the perceived needs of the various species are, prioritize these needs, and then discuss how the Gila National Forest intends to address the needs of the various State-listed species that are dependent upon lands it administers. I can appreciate the need to deal with many species on a case by case basis, but the Plan should provide at least some additional detail, i.e., assess the impact of how activities such as logging, road construction, prescribed fire, etc. will impact these species.

Recently the New Mexico Department of Game and Fish updated, expanded, and completely revised its Handbook of Species Endangered in New Mexico. Each species account contains a section dealing with the conservation needs of the species, which provides basic management guidelines that are needed for the preservation of the species. The Gila Forest should consult this publication and incorporate these management recommendations into the Plan.

1-GF-16

You state that the Forest Plan fails to address State listed threatened and endangered species. The Forest Plan explicitly deals with State listed species. The Forest-wide standards and guidelines specifically deal with coordination with NMDGF to establish recovery objectives and develop specific recovery projects. Specific species are dealt with within the management areas where they occur. For example, Management Area 7A specifically lists 16 State listed animal and plant species along with standards for protecting, improving, and maintaining their habitats.

We did use the Handbook of Species Endangered in New Mexico and the conservation needs sections were used to help develop our standards and guidelines. However, the conservation needs section is too general to be included directly in the management area prescriptions.

1-GF-17

MONITORING:

The introduction on page 287 of the Plan states that the purpose of monitoring and evaluating the implementation of the Forest Plan is to inform the decision maker of the progress being made toward achieving the goals, objectives, and standards and guidelines set forth in the Plan. I agree with and support the good intentions embodied within the former statement. Unfortunately, the funding proposed within the Plan to carry out the monitoring and evaluation of various activities, particularly those pertaining to wildlife, appear to be grossly inadequate. For example, on page 298 of the Plan, item nine cites a value of \$10,000 per year to implement wildlife monitoring. In view of the importance of wildlife and the Forest's obligation to provide quality wildlife habitat, the figure of \$10,000 per year is very unrealistic and extremely low. It could very easily take this amount to monitor impacts to a single endangered species, let alone all the indicator species and the bureaucratic costs associated with administering the program. The dollar value allotted to monitor wildlife in the Plan, when compared to other budgeted items, appears to be unrealistic and less than satisfactory

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Item three under the heading "Facilities" (pages 298-299), discusses roads and their construction. While a net of only 91 miles of new roads are to be built, 2,595 miles of road will be reconstructed. From a wildlife standpoint, the construction or reconstruction of this many miles of road has the potential to create significant disturbances that could negatively impact wildlife. Given the fact that road density data have not been provided within the Plan, it is impossible to assess the potential impacts upon wildlife from such a limited data base.

On page 288 of the Plan, the statement under item three indicates that only 5% of the timber treatment projects will be reviewed under field conditions. Timber treatment projects have the potential to drastically alter an area and thus it seems somewhat inconsistent, given the Forest's stated objectives in the introduction (page 287), to place what appears to be a low priority on the monitoring of these activities. Timber projects, along with other activities with the potential to significantly alter an ecosystem in a relatively short period of time, should be more closely monitored, i.e., certainly more than 5% of them should be inspected annually.

The monitoring plan has been reformatted in hopes of clearing up areas of confusion. The funding portion has been dropped because there is widespread misunderstanding of the intent of the funding shown in the Draft Plan. The funding shown in the Draft was intended to show additional funds over and above normal recurring funds specifically intended for monitoring. The monitoring actions are the control and they will all be accomplished with the budgets allocated to the Forest.

The 5% sample of timber sales is adequate. The intent is for Forest Supervisor's staff officers to make field reviews of 5% of the timber sales. These would be specific actions in addition to the normal administration of sales by district personnel.

LETTER NMDA

LETTER NMDA

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A Review and Analysis of the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan

Statutory Procedures
and
The Livestock Grazing Issue

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September 13, 1985

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LETTER NMDA

A Review and Analysis of the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan Statutory Procedures and The Livestock Grazing Issue

Introduction

The following text addresses the actions, concerns, and issues presented in the Gila National Forest Draft Environmental Impact Statement (DEIS) and Proposed National Forest Plan (PNFP) which impact livestock grazing on the Gila National Forest. The format of the text is divided between procedural and substantive comments on the DEIS and PNFP. The procedural comments refer to the evaluation of the adequacy of the DEIS and PNFP documents and the processes which they represent in regard to compliance with federal laws and regulations. The substantive comments represent an intensive review and assessment of the salient technical points and issues which comprise the DEIS and PNFP and which impact the environment and people of southwestern New Mexico.

I. Procedural Comments on the Gila National Forest DEIS and PNFP

The New Mexico Department of Agriculture (NMDA) has expressed, on numerous occasions, its concern that the U S Forest Service (USFS) has not consistently adhered to legally mandated procedures as required in the DEIS and forest planning processes. The DEIS and PNFP documents now under review have not corrected, in our opinion, procedural deficiencies noted by NMDA in prior DEISs and PNFPs (i.e., Cibola and Carson National Forests). They contain, in fact, several procedural deficiencies not evident in earlier documents. Specifically, we believe the USFS, in pursuance of required Gila National Forest DEIS and planning processes, has failed to, A) adequately provide for public participation in the DEIS and forest planning processes, B) facilitate the public's study and evaluation of the comparative merits of DEIS alternatives, C) include Section 8 (Public Rangelands Improvement Act (PRIA)) consultation provisions, and D) provide a sufficient spectrum of DEIS alternatives.

A. Adequacy of Public Participation

Regulations for implementing the National Environmental Policy Act (NEPA) are specific on the issue of public participation in the DEIS process. NEPA regulation 1500.2 (d) directs federal agencies to "Encourage and facilitate public involvement in decisions which affect the quality of the human environment." NEPA regulations 1506.6 (a) and (b) state that "Agencies shall make diligent efforts to involve the public in preparing and implementing their NEPA procedures" and "Provide public notice of NEPA-related hearings [and] public meetings."

The National Forest Management Act of 1976 (NFMA) is similarly emphatic on the issue of public participation. Section 6 (d) of NFMA states "the Secretary shall publicize and hold public meetings or comparable processes at locations that foster public participation." National Forest System Land and Resource Management Planning regulation 36 CFR 219.10 (b) reiterates the requirement for public participation by directing the forest supervisor to "publicize and hold public participation activities as deemed necessary to obtain adequate public input." In addition, planning regulation 36 CFR 219.6 (g) requires that "At least 30 days public notice shall be given for public participation activities associated with the development of regional guides and forest plans."

We have interpreted these statutes and regulations to mean that federal agencies involved in the DEIS and planning processes must diligently and actively foster, encourage, and provide for public participation through public meetings or comparable processes. It is our opinion that the USFS has conspicuously failed to adequately provide for mandated public participation in the Gila National Forest DEIS and planning processes as described above. This failure has occurred despite a formal request from NMDA (see Attachments I and II) to the USFS for public meetings or comparable processes.

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We disagree that the Forest Service has refused to actively and diligently encourage, foster, and facilitate public participation on the planning process. The National Forest Management Act requires "public hearings or comparable processes". The regulations, written to implement the National Forest Management Act, indicate that "Public participation activities should be appropriate to the area and people involved". The regulations also indicate that "Public participation activities may include, but are not limited to, requests for written comments, meetings, conferences, seminars, workshops, tours and similar events designed to foster public review and comment" [36CFR 219.6(d)]. Section 219.6(g) says that "at least 30 days' public notice shall be given for public participation activities...." The Gila National Forest did provide for appropriate comparable processes throughout the planning effort and did provide at least 30 days notice of these comparable processes. Our public involvement process was designed to meet the following objectives:

1. To broaden the information base upon which land and resource management planning decisions are made;
2. To ensure that the Forest Service understands the needs, concerns and values of the public;
3. To inform the public of Forest Service land and resource planning activities, and
4. To provide the public with an understanding of Forest Service programs and proposed actions.

The public involvement process began early in the forest planning process. The first step was to publish the Notice of Intent to prepare an Environmental Impact Statement in the Federal Register in 1980.

After this notice was filed, we began to gather information on Forest issues. The first step in generating issue information was to find out who was interested in forest planning. To do this, a card was mailed to all individuals on existing Forest mailing lists asking them if they wished to receive information regarding Forest planning. A news release requesting the names of interested individuals was also published in 16 newspapers in the Gila area of influence. These two types of contacts resulted in 2,374 requests to be put on the mailing list.

Next, a Public Involvement Workbook was developed. This workbook contained a short explanation of the planning steps and what an issue is, how we would evaluate public responses to issues, a list of the preliminary issues identified by Forest Service personnel, and a space to respond. This workbook was mailed to all individuals on the mailing list. Workshops to help people fill out these workbooks were held at seven locations. In addition to notifying the people on the mailing list of these workshops, the schedules were published in 14 newspapers and announced on 18 radio and television stations. The workshops were attended by approximately 155 people. We received 369 responses to the workbook. These responses were used to help develop the issues and concerns that drove the planning process.

The mailing list generated as part of the issue development process was maintained for use in notifying interested individuals about the draft Environmental Impact Statement and Proposed Plan. Approximately two months before the draft planning documents were ready for mailing, cards were sent to the people on the mailing list to inform them that the planning documents would soon be available and to ask them which documents they wished to receive. Individuals no longer interested in the planning process were removed from the mailing list.

On May 31, 1985, the Environmental Protection Agency printed the notice of availability of the Gila National Forest Plan Draft Environmental Impact Statement in the Federal Register.

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The USFS has apparently relied on an open, written invitation (see Attachment III) to the public for establishing one-on-one meetings between Gila National Forest personnel and interested parties or groups to satisfy NEPA, NFMA, and planning requirements for public participation in the DEIS and forest planning processes.

We do not consider one-on-one meetings that have occurred between Gila National Forest personnel and interested parties or groups as constituting public meetings or comparable processes as required by NEPA and NFMA. These meetings, by their very nature, have been primarily oriented toward and comprised of specific individuals and special interest groups requesting additional information on the Gila National Forest DEIS and PNFP. Consequently, the general public has been unfairly ignored and effectively excluded in the Gila National Forest DEIS and planning processes. The USFS has not made any diligent, encouraging or active efforts, to our knowledge, to foster a reasonable and constructive participatory partnership between themselves and the public in pursuance of mandated DEIS and forest planning processes.

Specifically, the issuance of the USFS invitation by the Gila National Forest was not made available to the general public. Knowledge of this invitation was restricted primarily to those individuals already having copies of the Gila National Forest planning documents in their possession (the letter of invitation was included with those documents). Additionally, the issuance of a written invitation that is obtainable only through acquisition of the planning documents (or indirectly by word-of-mouth) is a passive rather than active or diligent effort by the USFS to encourage, foster, and facilitate public involvement. More importantly, public notice of these one-on-one meetings was either non-existent or inadequate. Planning regulation 36 CFR 219.6 (g) expressly directs the USFS to provide, "At least 30 days public notice...for public participation activities...." Since 30 days public notice was not given, to the best of our knowledge, we must assume either that these meetings were not public participation activities or that they were held in violation of federal laws and agency regulations.

We are concerned by the USFS's attitude in refusing to actively and diligently encourage, foster, and facilitate public participation (public meetings or comparable processes) in the Gila National Forest DEIS and planning processes and to provide adequate public notice (30 days). Accordingly, we strongly recommend that the 90 day DEIS and PNFP review period (36 CFR 219.6 (g)) be reopened and adequate provisions made for public participation. In our opinion, the legality of final decisions emanating from the Gila National Forest DEIS and planning processes will be partially predicated upon the sufficiency of the USFS's effort in providing for and encouraging public participation.

B. Concurrent Versus Consecutive Review of DEIS and PNFP Documents

The Gila National Forest DEIS and PNFP documents have been made available to the public for concurrent review. The position stated by NMMA in earlier DEIS and PNFP comment periods (Cibola and Carson National Forests) has been that concurrent review violates NEPA regulations governing public review of environmental analysis documents. A detailed statement of NMMA's position on this procedural issue is provided in the Attachment IV. The USFS position on concurrent review is presented in Attachment V.

Two issues are pertinent to the legality of concurrent review of the Gila National Forest planning documents, in our opinion. The first issue pertains to federal laws and regulations that may or may not require concurrent review of environmental analyses and forest plans. Our interpretation of planning regulations 36 CFR 219.10 (b) and 219.12 (a) and NEPA regulations 1500.2 (c), 1501.2 (b), 1502.25 (a) and 1506.4 is that, 1) concurrent review of DEISs and PNFPs is not required, and 2) that concurrent review of DEISs and PNFPs is not justifiable in view of their mutually exclusive purposes.

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On May 31, 1985, Forest personnel sent planning documents to all individuals/parties that requested copies of specific documents. A letter was also sent to those that received the documents explaining that if they or the groups with which they were associated wished to meet with us about the document, to please call and we would make arrangements.

At the time the documents were mailed, news releases indicating the availability of the documents and the length of the public comment period were sent to 24 newspapers and radio stations. Those people requesting documents were also sent a copy of the letter.

Later, a second news release was sent to the newspapers and radio stations. This news release informed the public that, due to several requests for an extension, the public response period had been extended 30 days. This news release also stated that arrangements could be made with the Forest Service to hold individual or group meetings upon request. We interpreted this offer to meet with individuals as a comparative public involvement process. The public was notified of this activity "at least 30 days before the end of the public comment period". Since meetings were held at the request of individuals and groups, individuals requesting the meetings generally notified other interested parties, with no additional notification attempted by us.

We feel that this process was appropriate for the public and met our public involvement objectives as well. The original public involvement period has already been extended 30 days and we feel that another extension would only delay the planning process and would not result in additional substantive information. General public meetings held on the Forest during RARE II and for unit planning efforts resulted in poor attendance from the general public that members of the Department of Agriculture indicated would attend. The appropriateness of the approach we used was also confirmed by the low public meeting attendance experienced by other National Forests. The meetings that were held by request were well attended (over 190 people total). They provided us with a good understanding of the needs and interests of our publics and gave those requesting the meetings the opportunity to increase their understanding of the Proposed Plan and draft Environmental Impact Statement. The opportunity to request this type of meetings was widely publicized. Public comments and participation were actively and diligently encouraged. Public participation was fostered by the fact that we offered to meet with anyone at a time and place that was convenient to them, and not only at a meeting time and place that was established by us.

The State Department of Agriculture also indicated in their comments that we ignored their request for "public meetings or comparable processes." This is not the case. As a result of the Department's request, we invited them to meetings that we had with various interest groups. Department personnel were invited to a meeting with the Dona Ana County Associated Sportsmen in Las Cruces, the Sierra Club in El Paso, the Sierra Club in Las Cruces, the Forest Permittees in Luna, the Farm and Livestock Bureau in Quemado and the Permittee meeting in Silver City. We informed them of the meetings as soon as possible after the groups requested the meetings. One person from the Department attended only the Sierra Club meeting in Las Cruces.

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We disagree with your conclusion that concurrent review periods for draft Environmental Impact Statements and Proposed Forest Plans violate Federal statutes and discourage meaningful public participation. In our opinion, the opposite is true. There are a number of regulations which support our

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The second issue pertains to the extent to which concurrent review is in compliance with the draft EIS process as intended under NEPA regulations. A brief excerpt from NMDA's letter to Mr. James C. Overbay will serve to summarize our position on this issue.

Section 1502.14 of NEPA regulations refer to the presentation of alternatives, including the proposed action, as "the heart of the Environmental Impact Statement." Section 1502.14(b) of NEPA regulations directs the concerned agency to "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits." Clearly, if the regulations reflect NEPA, Congress intended that environmental alternatives be presented fairly and equally in the draft EIS process. Although the USFS has presented alternatives fairly and equally in the draft EIS document, it is our contention that the USFS has not presented alternatives fairly and equally in the draft EIS process.

The draft EIS process, as currently conducted in New Mexico, involves the concurrent review of the draft EIS and PNFP documents by the public. In our opinion, the inclusion of the PNFP in the draft EIS process effectively biases the reviewer's ability to evaluate the comparative merit of all alternatives by focusing unequally and unfairly upon a single alternative, the proposed action. Although the PNFP is not an environmental analysis document, the mere fact of its simultaneous presence, and the authority it implicitly imparts, serves to persuade the reviewer of the relative superiority of the proposed action and discourages the reviewer's impartial participation in the draft EIS process by fostering a belief, correct or not, that the proposed action is a fait accompli.

A current videotape on forest planning, distributed by the USFS, Region III, exemplifies the effective circumvention of the draft EIS process by concurrent review. Toward the conclusion of the videotaped presentation, a USFS representative instructs viewers on how to review the DEIS and PNFP documents. They are told to first review the PNFP, which delineates in detail the USFS proposed alternative. Following review of the PNFP, viewers are encouraged to examine the DEIS alternatives and to compare those alternatives to the USFS's proposed alternative. The effect of this videotaped presentation is to effectively circumvent the NEPA DEIS process by advocating that alternatives be evaluated on the merit of the proposed alternative and not on the basis of their own merits. Also, the videotaped presentation seriously biases the DEIS review process by placing disproportionate emphasis on only one alternative, the proposed alternative of the USFS.

It is our opinion the NEPA regulations and forest planning regulations mentioned above, which are derivatives of the Forest and Rangeland Renewable Resources Planning Act (RPA) of 1974, NFMA and NEPA, strongly support our contention that concurrent review of the Gila National Forest DEIS and PNFP is implicitly prohibited by Federal law and that it is in contravention of the intent of Congress. Mandated processes for evaluating environmental analysis and planning documents should not be modified for the convenience of the issuing agency. Accordingly, we recommend that the current review process of the Gila National Forest DEIS and PNFP be immediately terminated and that a revised process be substituted in its place which will provide for the consecutive review of the Gila National Forest DEIS and PNFP documents.

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procedure. In addition to the procedure being legally mandated, there is good rationale behind our procedure, and we believe it provides the public a meaningful opportunity to understand and influence future management of the forest.

Environmental impact statements and forest plans are distinct documents prepared in accordance with different laws and regulations. Both documents have legally mandated public review requirements. Environmental impact statements are prepared in accordance with the regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) (40 CFR 1500-1508). Forest plans are prepared under the regulations for National Forest System Land and Resource Management Planning (36 CFR 219). The NEPA regulations require that environmental impact statements be available for public review for at least 45 days (40 CFR 1506.10(c)). The National Forest Management Act requires that proposed forest plans be available for public review for at least three months (16 USC 1604(d)). The planning regulations require both public review periods be at least three months and that they run concurrently (36 CFR 219.10(b)). The planning regulations also require that a single process be used to satisfy both NEPA and planning requirements (36 CFR 219.12(a)).

The New Mexico Department of Agriculture contends in their rebuttal to the Forest Service explanation (Attachment IV) that concurrent review is not required by 36 CFR 219.10(b). Their contention is based on a partial quotation of the regulation. The complete text of 36 CFR 219.10(b) is:

"[b] Public review of plan and environmental impact statement. A draft and final environmental impact statement shall be prepared for the proposed plan according to NEPA procedures. The draft environmental impact statement shall identify a preferred alternative. To comply with 16 U.S.C. 1604(d), the draft environmental impact statement and proposed plan shall be available for public comment for at least 3 months, at convenient locations in the vicinity of the lands covered by the plan, beginning on the date of the publication of the notice of availability in the Federal Register. During this period, and in accordance with the provisions in 219.6, the Forest Supervisor shall publicize and hold public participation activities as deemed necessary to obtain adequate public input."

The key point that you omitted from your quote from the regulation is the requirement that the three month review period for both documents will begin with the date of publication of the notice of availability in the Federal Register. The notice of availability only applies to environmental impact statements and is published weekly by the Environmental Protection Agency for environmental impact statements which have been filed during the preceding week. Therefore, since the review period for both documents is triggered by the date the notice of availability for the environmental impact statement is published in the Federal Register, the review periods for the documents must be concurrent.

In addition to the requirement to have concurrent review periods in 36 CFR 219.10(b) and 36 CFR 219.12(a), NEPA regulations provide for concurrent reviews in several places. Section 1500.2(c) requires that NEPA requirements be integrated with other planning and review requirements and that procedures will run concurrently rather than consecutively. Section 1501.2(b) reiterates that environmental documents be circulated and reviewed at the same time as other planning documents. Section 1502.25(a) again states that environmental impact statements should be concurrent with products and requirements of other laws and regulations. Finally, Section 1506.4 provides for combining documents.

In your comments you state that "...concurrent review of the Gila National Forest DEIS and PNFP is implicitly prohibited by Federal law..." and "...concurrent review violates NEPA regulations...." However, in Attachment IV in response to the Forest Service explanation of the concurrent review process, the Department refutes their own allegations, stating, "We do not deny that NEPA provides the authority, even the encouragement, for concurrent reviews...." The Forest Service position as has already been stated is that 36 CFR 219.10(b) requires concurrent review and that NEPA regulations provide authority, and in New Mexico Department of Agriculture's words, encouragement for concurrent review of the documents. Clearly concurrent review of environmental impact statements and proposed forest plans is in compliance with legal requirements and follows the intents of Congress.

Even without the clear legal mandate, concurrent review periods for environmental impact statements and proposed plans are logical.

To understand the rationale, it is necessary to view the documents separate from the analysis process preceding them. A number of alternatives were analyzed. These alternatives are different proposed forest plans which were all fully developed and analyzed. Each alternative is a combination of choices made from a wide range of prescriptions and timing options. The alternatives were evaluated on how each maximized net public benefits. Once analysis and evaluation were completed, one alternative was selected as the Forest Service Proposed Action Alternative.

Once the Proposed Action Alternative was identified, the environmental impact statement was prepared to disclose environmental consequences associated with the Proposed Action Alternative and all other alternatives. The intent of the environmental impact statement is to provide full and fair discussion, comparison, and evaluation of the Proposed Action Alternative and all other alternatives. In your comments, you agreed that these objectives were met, stating, "...the USFS has presented alternatives fairly and equally in the draft EIS document...." The environmental impact statement is the document resulting from the environmental analysis process. If the document treats the alternatives fairly and equally, there is no logic to support your statement that alternatives were somehow not treated equally and fairly in the environmental analysis process.

On the other hand, the Proposed Forest Plan was prepared to provide the details on how, when, and where the Proposed Plan could be implemented. The Forest Plan translates the results of analysis into integrated management direction in a readable format for specific geographic locations.

We believe the public is mainly interested in what is being proposed in specific locations and how management on the ground will actually be carried out if the proposed plan were implemented. The Proposed Forest Plan provides this information while the Environmental Impact Statement provides information on environmental consequences on a forestwide basis. Both are necessary for the public to make informed comments.

Based on the volume and quality of comments we have received, public participation has not been discouraged. Many changes have been made to the Environmental Impact Statement and Proposed Plan. We have found that specific comments to the Proposed Plan are very constructive and help us to be responsive. However, without information that sheds new light on analysis and evaluation of alternatives, voting on alternatives is of little value. On the other hand, working toward a more implementable plan is very productive. Circulating proposed plans along with the environmental impact statements helps focus on getting the best possible plan implemented on the ground.

The Proposed Forest Plan is the result of analysis and evaluation of several plans documented in a DRAFT environmental impact statement. Therefore, this is not a "de facto" plan. It is not final and many significant changes have been made in response to public comments.

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C. Section 8 (PRIA) Consultation Provision

Section 8 (a) of PRIA directs the Secretaries of the Interior and Agriculture, upon decision to formulate an allotment management plan (AMP), " to do so in careful and considered consultation, cooperation, and coordination with the lessees, permittees, and landowners involved, the district grazing advisory boards established pursuant to section 403 of the Federal Land Policy and Management Act (43 U S C 1753), and any State or States having lands within the area to be covered by such allotment management plan " Additionally, the Secretary concerned is permitted to " revise or terminate such plans or develop new plans " only after " review and careful and considered consultation, cooperation, and coordination with the parties involved "

We believe the intent of Congress in formulating this provision was to facilitate and foster a constructive working relationship between livestock permittees and their respective custodial agencies. Accordingly, we have interpreted this provision to mean that federal land management agencies have a responsibility to inform affected parties of their privileges under Section 8 and to actively encourage careful and considered consultation, cooperation, and coordination with livestock permittees prior to implementation, alteration, or development of AMPs.

Despite the apparent intent of Congress, the USFS has ignored Section 8 consultation provisions in the Gila National Forest DEIS and PNFP documents and review processes. The DEIS and PNFP documents, for instance, offer no mention of Section 8 guidelines applicable to affected permittees and lessees. Nevertheless, the alternatives presented in the DEIS and the proposed alternative in the PNFP detail major actions which will likely impact the majority of the 110 AMPs now in effect on the Gila National Forest through adjustments in permitted animal unit months (AUMs). Under these circumstances, inclusion of Section 8 consultation guidelines in the Gila National Forest environmental analysis and planning documents would have seemed both necessary and reasonable. Such inclusion would have ensured that impacted, or potentially impacted permittees, were made aware of their participation privileges and would have encouraged them to pursue those privileges to the fullest extent allowed by law.

A strong case can also be made that the DEIS and forest planning processes are, in themselves, subject to the consultation provision of Section 8 of PRIA. To the extent that the Gila National Forest DEIS and PNFP documents delineate alternatives that may necessitate revision, termination, or development of AMPs, we believe that Section 8 consultation would have been relevant and appropriate in the preparation of these documents and in the pursuance of their review. However, we have no information to suggest that the USFS invoked Section 8 provisions in either the development or review of the Gila National Forest DEIS and PNFP. No apparent attempts were made by the USFS to request or encourage the participation of individual permittees and lessees or the Gila National Forest grazing advisory board. The failure of the USFS to consult, cooperate, and coordinate with affected permittees and their democratically elected representatives (grazing advisory board members) amounts to indifference toward the public it must serve and the Congress to which it must answer.

The omission of Section 8 provisions and implementations in the DEIS and PNFP documents and processes is sufficient cause, in our opinion, to request revision of the DEIS and PNFP documents and, upon their completion, to reopen the DEIS and PNFP review processes. We believe the USFS is obligated to facilitate Section 8 consultation, cooperation, and coordination with permittees to the fullest extent possible. Accordingly, we urge the USFS to make appropriate changes in the Gila National Forest DEIS and PNFP documents and processes to accommodate congressionally mandated permittee involvement.

In summary, we believe there are legal and sensible reasons for the review procedure and that productive public comment has been fostered rather than hindered.

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We disagree. Section 8(a) refers specifically to preparation of allotment management plans. The Public Rangeland Improve Act was passed in 1978, two years after NFMA. If congress had intended forest plans to be subject to Section 8 consultation, it would have been so directed in the legislation.

This Forest Plan is not the same as an allotment management plan, and as a result, Section 8 consultation is not appropriate. Section 8 consultation will be undertaken when allotment management plans are prepared.

Even though Section 8 consultation is not appropriate, public involvement activities mandated by the National Forest Management Act and the National Environmental Policy Act resulted in a lot of permittee participation. This participation began during the issue identification phase of the planning process and was intensified during the draft Plan and DEIS review phase.

When the draft planning documents were sent to permittees, a personal letter was enclosed. This letter explained where to look and how to find which management direction was proposed for the management area containing their allotment. We also offered to meet with them individually or as a group to discuss the documents. Initially, we received very little initial response to this letter.

During a Grazing Advisory Board field day on September 18, 1985, we reviewed the Plan with the permittees present. Several individuals expressed a concern that the permittees still were not aware that the Proposed Plan could potentially have an effect on them. As a result of, another letter was sent to all permittees explaining that it was important to review the documents, and that we would be willing to discuss, individually or in groups, any concerns or questions they had.

The second letter resulted in requests for three meetings. Two of these meetings were designed primarily to answer questions and help us understand concerns, and the third was designed to answer questions and provide the permittees the opportunity to make comments that would be part of the response record. The meetings were held in Luna on October 1, 1985, in Quemado on October 3, 1985, and in Silver City on October 4, 1985. Approximately 90 people attended these meetings.

One concern that was expressed at these meetings was a feeling that the permittees did not understand how the data in the Plan was formulated and how the Forest planning model was developed. As a result, a subsequent meeting was scheduled to explain this data. A letter was sent to all permittees that provided details concerning this meeting. Approximately 15 permittees attended this meeting.

The accuracy of the wildlife population estimates was another concern expressed in the meetings. Several permittees felt they could help to improve this information. As a result on December 6, 1985, all permittees were sent a letter requesting estimates of wildlife populations on their allotments. This data was used, along with data from other sources, to improve the wildlife estimates in the final Plan.

In addition to providing wildlife information, a group of permittees helped re-write sections of the Plan to improve clarity and appropriateness. This was also a result of concerns expressed during meetings and in conversations with individual permittees.

We feel the level of involvement by permittees has been appropriate and has resulted in changes that made the final Plan a better document.

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D. Sufficiency of Alternatives Presented in the DEIS

The presentation of alternatives "is the heart of the environmental impact statement" (NEPA Regulation 1502.14). NEPA regulation 1502.14 (a) requires affected federal agencies to "thoroughly explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." Additionally, forest planning regulation 219.12 (f) requires the USFS interdisciplinary team preparing an EIS to "formulate a broad range of reasonable alternatives according to NEPA procedures." These alternatives, according to this regulation, "shall be distributed between the minimum resource potential and the maximum resource potential."

The principle criteria for selection and consideration of alternatives appears to be the extent to which they encompass a maximum range of feasible options. The Office of General Counsel for the U.S. Department of Agriculture has stated that NEPA "requires a full exploration and 'hard look' in 'good faith objectivity' at a broader range of alternatives than those few most likely to be selected by the prudent manager" (see Attachment VI).

The memorandum from which the previous statement originated, goes on to say "that the alternatives for most forest plans are rather narrowly drawn, and often do not provide the 'broad range' of alternatives required by the National Environmental Policy Act." The Office of General Counsel concludes that, all too often, alternative proposals have been "concentrated in a very narrow spectrum which does not offer or explore the full range of possibilities available to the decision maker." The intent of NEPA, in view of the General Counsel's interpretation, is to provide in the EIS process a range of alternatives beyond the narrow range deemed managerially practical by the agency involved.

We are concerned that alternatives presented in the Gila National Forest DEIS do not comply with the General Counsel's interpretation of NEPA. Specifically, we do not believe the USFS has sufficiently considered the full range of feasible livestock alternatives. Minimum and intermediate livestock options are fully developed in the DEIS. However, unlike other forest resource outputs (i.e., timber harvests in Alternative D and wildlife in Alternative F), a legitimate maximization alternative for livestock production is not presented. The narrow range of livestock options that appear in the DEIS is not adequate in our opinion. The USFS has calculated a maximum benchmark of 435,000 AUMs for the carrying capacity of the Gila National Forest. We believe a reasonable and feasible range of alternatives should include a livestock production alternative that approaches this benchmark figure.

Livestock numbers in the current DEIS are "relatively" maximized only in conjunction with optimization of other forest outputs (i.e., timber harvests in Alternative C and wildlife in Alternative E). Achievement of a true livestock maximization alternative is constrained by a prior decision to maintain competing forest outputs at predetermined, optimal levels. Nevertheless, we believe that inclusion of a maximum livestock production alternative in the Gila National Forest DEIS, that is not dependent on maximizing or optimizing other outputs, is necessary to ensure compliance with the intent of NEPA. Also, the formulation of such an alternative will broaden the public's understanding of feasible options available to land managers and, in so doing, will facilitate the public's evaluation of the "comparative merits" of all alternatives (NEPA Regulation 1502.14 (b)).

Accordingly, we recommend a maximum livestock alternative be considered and included in a revised Gila National Forest DEIS. In the event the alternative is eliminated from detailed study, the USFS should provide an explanation for its elimination in the text of the DEIS.

The Maximum Grazing Benchmark maximized grazing capacity. It was analyzed in depth, but not discussed in detail in DEIS because it resolves only the grazing issue without satisfying others. Alternative D and F do not as you suggest, maximize timber harvest or wildlife outputs.

Because of the budget constraints in all alternatives except the RPA alternative (B), none of the alternatives maximize the outputs for any resource. In reviewing the alternatives, however, we found that an increase in existing outputs was provided for in some alternative for all resources except range. As a result, we have increased the Alternative C 5th decade level of grazing to 400,000 AUMS.

II. Substantive Comments on the Gila National Forest DEIS and PMFP

Our review of the Gila National Forest DEIS and PMFP has revealed several technical points and issues which require comment or clarification. In particular, we have specific questions on the following points:

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- A. Adequacy of data bases used in the estimation of allotment carrying capacity.
- B. Meaning and application of "carrying capacity" on the Gila National Forest.
- C. Reliability and appropriateness of range condition measurements on the Gila National Forest.
- D. Adequacy of future range monitoring programs.
- E. Extent of and rationale for projected AUM reductions on Gila National Forest allotments.
- F. Issues and concerns related to projected AUM reductions in the PNFP.
- G. Proposed AUM increases associated with projected range improvement in the PNFP.
- H. Forest output benefits, values, and associated costs.
- I. Comparability of livestock and wildlife values and benefits.
- J. Reduction of livestock AUMs for forage reallocation and improvement of wildlife habitat.
- K. Alternative perspectives on alleged livestock and wildlife conflicts.
- L. Animal Damage Control.
- M. Adequacy of DEIS economic impact analysis.
- N. Livestock grazing and riparian areas.
- O. Livestock grazing and forest soil erosion.

A. Adequacy of Data Bases Used in the Estimation of Allotment Carrying Capacity

The Gila National Forest DEIS notes that "the objective of all alternatives is to bring the over-appropriated use of forage resources in balance with capacity" (p 102, DEIS). The PNFP is explicit on the extent of over-appropriation of forage for livestock. "Currently, permitted use for the forest is 383,744 AUMs while capacity is 314,422 AUMs" (p 11, PNFP).

The accuracy of the USFS's estimation of carrying capacity on the Gila National Forest is critical, in our opinion, to the stewardship of the land and to the well-being of the permittees who live on the land. Major management decisions will be based on the DEIS and PNFP assumptions concerning the imbalance existing between livestock use and forest production capacity. Many livestock permittees will face moderate to severe reductions in allotment stocking rates in the attempt to correct perceived grazing imbalances. Accordingly, we request information from the USFS concerning the data bases utilized in determining estimated carrying capacity on the Gila National Forest.

Our primary concern is the adequacy of data bases used for estimating allotment carrying capacity. Estimations of carrying capacity, in our opinion, are reliable only to the extent that they are based on recently accumulated data which have been collected consecutively over a time period of several years. Preferably, the time period for consecutive collection of production, utilization, composition, climatic, and other data should encompass a representative range of climatic variations (principally precipitation) common to the area being studied. The means of the climatic variations occurring within the monitoring period should correspond to historical averages for the same area. We believe an intensive monitoring period of five to seven years would be the minimum duration for meeting this objective.

NMDA-5

The allotment analysis is a very labor intensive process. To adequately vegetative type map; determine range condition and trend; assess the environmental consequences of livestock grazing on soils, wildlife, recreation, timber; etc. on one allotment may take up to one year to complete. The allotment analysis serves as base data for future management on the allotment. Rereading of permanent clusters (Parker 3 step), forage production utilization studies, and annual inspections allows the range-trained professional to validate livestock impacts and adjust management to meet the management objectives. The data in the allotment analysis data base is an average of 16 years old as of 1986. Forage production and utilization studies are conducted as necessary to validate management. They are completed on approximately 10 percent of the allotments each year. In situations where capacity is in question the intensity interval may be every year. In situations where livestock are meeting the planned objectives, the interval may be 10 or more years. Monitoring of livestock impacts with changes in management intensity, climatic conditions, and other resource activities is a continuous process conducted in all phases of National Forest management. We feel the process methodologies used by the Forest Service in determining carrying capacity are reasonable and accurate.

The term "carrying capacity" appears to surface as a major concern in your statement. Carrying capacity, as you suggest, is a result of many factors that change with management intensity, climate, and the natural ability of the land to produce. These variations require the Forest Service to continually monitor and evaluate carrying capacity. Based on 50 years of observations as described above, a data base was developed to address future output projections for the Forest Plan. The projections are based on existing data; actual adjustments in livestock numbers will be determined using existing scientifically sound procedures. The data provides a starting point from which to evaluate management and Forest objectives. Management will be determined in conjunction with the livestock operator and other resource uses and activities.

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We also understand that the principal unit of USFS monitoring on the Gila National Forest is the allotment analysis. The number of allotments occurring on the forest is 140 (p 22, DEIS Summary). Since the combined analyses of each of these allotments comprise the data base upon which estimations have been made of current forest carrying capacity, we request clarification on the history, intensity, and frequency of allotment analyses, including other supplementary monitoring, used in the preparation of the DEIS and PNFP.

Specifically, we would like to know the date of the last allotment analysis performed on each allotment, the frequency and intensity at which production and utilization data were collected, and the corresponding climatic conditions that were recorded for those monitorings. Reliable estimation of carrying capacity is crucial, in our opinion, because it is the cornerstone of the grazing management program. It is important to the conservation of the land and to the economic well-being of the permittee who must make his living on that land. Consequently, we are disappointed that such information was not included in the DEIS or PNFP.

In our opinion, the adequacy of the DEIS and PNFP, as they relate to range management, is predicated not only on the existence of the data we have requested, but on the extent to which that data is scientifically defensible and tenable. We assume that the USFS does have data bases available that were consulted in estimation of allotment carrying capacity. However, the USFS has presented no evidence to suggest that previously collected data, which was used in the development of the Gila National Forest DEIS and PNFP, meets the technical standards we believe are necessary for the reliable and accurate determination of forest carrying capacity.

If allotment carrying capacities for the Gila National Forest have not been estimated on the basis of recently collected data, consecutively gathered over an extended period of time, we strongly recommend the USFS initiate an appropriate monitoring program (possibly modeled after the monitoring program now being used by the Roswell District of the Bureau of Land Management (BLM) in New Mexico) to provide adequate data bases. Until these data bases are compiled, the USFS should not issue decisions concerning proper stocking rates for allotments nor should the USFS develop plans predicated upon yet undetermined forest-wide carrying capacities. We must also reiterate that issuance of final decisions should be dependent on prior consultation, cooperation, and coordination with permittees as required by Section 8 of PRIA.

In addition to the preceding request, we have specific questions concerning (past sampling methodologies and the adequacy of site capability information). Particularly, we are concerned that sampling methodologies used in earlier allotment analyses are not comparable to more recently developed methodologies in terms of data accuracy and reliability. We perceive this to be a potential problem for allotments that have not been reevaluated for 15 or 20 years. Data collected for these allotments and used in the DEIS and PNFP formulation may be suspect and should be carefully scrutinized by USFS technicians. We request clarification on changes, if any, in sampling methodologies that have occurred between the most recent and most dated allotment analyses.

Additionally, we are concerned that sufficient range site or habitat type information was not available at the time these allotments were studied. We believe that unless sampling within allotments was properly stratified by range site or habitat type, the data collected for those allotments cannot be used to accurately estimate allotment carrying capacity. The reliability of production coefficients developed for specific capability areas and used for carrying capacity estimations must also be predicated on the adequacy of sampling methodology and sampling stratification. Again, we request information concerning sampling methodologies and, in particular, sample stratification procedures followed in data collection.

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B. Meaning and Application of "Carrying Capacity" on the Gila National Forest

Having carefully reviewed both the DEIS and PNFP documents, we are puzzled by the USFS's intended meaning for "carrying capacity". The ambiguity surrounding this term in the DEIS and PNFP raises serious questions, in our minds, as to the intent of the USFS in managing the public lands of the Gila National Forest. Specifically, is the USFS managing public land for biological potential on a sustained yield basis or for administratively set potential on an arbitrary and unknown basis? Is carrying capacity a biological concept or an administrative concept in the eyes of the USFS? A commonly accepted interpretation of carrying capacity is found in the glossary of the DEIS (p. 159). This particular definition emphasizes the biological character of carrying capacity by referring to it as "the optimum density of a species which a given environment or range is capable of sustaining, without deteriorating that environment or range". In our opinion, this definition is technically appropriate and scientifically sound.

However, we believe the USFS has not been consistent in the definition or use of "carrying capacity" in the Gila National Forest DEIS and PNFP. The USFS claims in the DEIS that "permitted use for the forest is 383,744 AUMs while capacity is 314,422 AUMs" (p. 11). It is also stated in the DEIS that capacity is increasing on the Gila National Forest (p. 11). This increase is occurring despite an alleged significant imbalance between permitted use and forest carrying capacity. The concurrence of alleged overstocking and increasing biological carrying capacity is a perplexing phenomenon.

The USFS attributes such an increase to "past management direction and investments" (p. 11). We cannot fully accept this explanation. Unless range management and investments are sufficient to balance permitted use and biological carrying capacity, we would expect a net decline in livestock capacity and ecological condition on the forest. The DEIS Summary does refer to resource degradation occurring on 52 of the existing 140 grazing allotments on the Gila National Forest (p. 22). We assume that this alleged resource degradation is attributable to the imbalance in permitted use and biological carrying capacity noted by USFS personnel. However, the resource degradation mentioned in the DEIS is not necessarily a function of overstocking; it is also a function of "the lack of proper management" (p. 22, DEIS Summary). In our opinion, the issue of proper management is central to the apparent dichotomy in the usage and meaning of "carrying capacity" in the Gila National Forest DEIS and PNFP documents.

Logically, the presence of resource degradation would appear to support the USFS contention that livestock capacity is currently exceeded by permitted use on the Gila National Forest (if one discounts increases in biological carrying capacity). Yet, we are concerned with how the USFS has measured and determined such resource degradation. Range condition classes for the seven major vegetation types on the Gila National Forest are listed on page 71 of the DEIS. Range condition, however, is not a measure of degradation or amelioration of natural resources. Range trend, which is comprised of two or more measures of range condition across time, is the appropriate measure of resource improvement or deterioration. The DEIS and PNFP documents are conspicuously silent on the issue of range trend.

Nevertheless, the USFS refers to resource deterioration on 52 allotments as necessitating stocking rate adjustments. We would like to know the methods used by the USFS, and the dates they were applied, to measure and evaluate purported resource degradation. Realizing the difficulties involved in compiling accurate estimations of carrying capacity and the probable age of many allotment analyses, we are concerned that USFS claims of resource degradation are based more on subjective field evaluations than on rigorous and statistically sound field measurements of the resources of the Gila National Forest.

NMDA-6

The concern with the term "carrying capacity" has been discussed with members of the State Department of Agriculture on previous occasions. We disagree with your contention that the term "capacity" has been used inconsistent with the glossary definition. Carrying capacity for livestock, as it is used in the Forest Plan, is dependent upon the administrative management intensity applied. As an example, the Forest may have forage available [biological capability] but if the proper facilities to harvest that forage by livestock are not available, or if the area is key to other resources, the capacity [administrative capacity] will change. Thus if facilities were available at some cost and no other resources were affected, the administrative capacity may be the same as the biological capacity.

NMDA-7

The imbalance in capacity and permitted AUM's is based on past monitoring of the range resource using allotment analysis data. We are aware, from our monitoring program, that some areas of the Forest are improving under current management while others are continuing to decline. The perplexing phenomenon you mention is not hard to understand if you accept the fact there is a difference in capacity and permitted numbers over the Forest as a whole. Within some individual allotments, capacity is increasing due to higher levels of management. The increases in capacity on portions of the Forest have not eliminated the over stocking identified in the analysis in other portions of the forest. There are a greater number of allotments improving in capacity than there are allotments declining in capacity; therefore the Forest shows a net gradual improvement in capacity.

NMDA-8

Trend is important and is used [expressed] as comparison of past studies with the present condition. Trend is however very difficult to address when applying it to a large area such as the Gila National Forest. There are areas with an upward trend and other areas with a downward trend within the same allotment. The same can be said for a management area or the Forest. Trend changes can occur annually depending on moisture received or management intensity applied to the land. The allotment analysis procedures take into consideration trends and the reason why trends are moving up or down. Management to correct downward trend or to improve upward trends vary with each situation at the allotment level and is meaningless at the Forest level.

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NMDA-9

Our greatest concern is that resource degradation and estimated forest carrying capacity, as presented in the DEIS and PNFP, have been determined on the basis of factors other than the actual condition of resources and the forest's biological ability to support livestock. Specifically, the USFS places considerable emphasis on the identification of allotments on the basis of their satisfactory or unsatisfactory condition or management (condition and management appear to be interchangeable terms in the context of this evaluation system). Satisfactory management (or condition) "occurs on allotments which management actions are proceeding according to a schedule (Allotment Management Plans) that will not permit regression in range condition or trend" (p. 35, PNFP). Allotments that lack proper management "are classified as unsatisfactory" (p. 22, DEIS). Since the DEIS and PNFP make no mention of trend data and provide no reliable range condition data (Section II C, NMDA comments), we must conclude that the USFS has determined satisfactory and unsatisfactory management and condition by means other than intensive field study.

Regardless of the method used by the USFS in determining satisfactory and unsatisfactory condition and management (subjective field evaluation or administrative policy), the impact on estimated carrying capacity is the same. The "Range Analysis and Management Handbook" for the USFS in New Mexico contains "allowable use" guides based on the intensity of management. These "allowable use" guides are used to partially determine the carrying capacity of allotments on the Gila National Forest. The percent allowable use is a function of both range condition and the intensity of management. The reliability of allowable use percentages, from the perspective of range condition is discussed in Section II C of NMDA's comments. However, for any range condition class, percent allowable use varies by management strategy. Range in fair condition is permitted 20 percent utilization under continuous use and 50 percent utilization under certain rest-rotation grazing systems.

We do not deny that grazing management is a useful tool for achieving certain objectives in rangeland conservation. We are troubled, however, by the undocumented and biologically unsupportable (in our opinion) linkage of allowed use percentages to grazing management systems as presented in the "USFS Range Analysis and Management Handbook". Is wildlife forage allocation, for instance, determined by the same allowable use percentage associated with continuous grazing by livestock? Moreover, we are concerned that the USFS has used unsubstantiated claims of satisfactory or unsatisfactory condition and management to determine Gila National Forest allotment carrying capacities, as presented in the DEIS and PNFP. Contrary to the biological definition of carrying capacity presented in the DEIS glossary, the USFS appears to have used an administrative concept of carrying capacity in formulating environmental analyses and forest plans.

Allotments (particularly those with AMPs) not achieving management levels deemed appropriate by USFS personnel are declared unsatisfactory (frequently without Section 8 consultation) and subsequent reductions are made in stocking rates. Those reductions, in our opinion, are not based on biological considerations. They are administratively determined. The DEIS and PNFP have not provided sufficient information to convince us of the accuracy of allotment carrying capacity estimates or the source and reliability of observed resource degradation trends. Consequently, we have found it difficult to determine the biological basis for the DEIS and PNFP carrying capacity projections (both current and future). Until additional information is provided by the USFS, we must assume that "carrying capacity", as used by the USFS in the Gila National Forest DEIS and PNFP, is an administrative, not biological, concept. Accordingly, we cannot accept as scientifically valid and defensible the assumption made by the USFS in the DEIS and PNFP that permitted use currently exceeds carrying capacity.

Adjustments in livestock numbers are not made through the Forest Plan, but through an administrative effort using the Region 3 Standard Allotment Analysis procedures. Reductions are based on several years of intensive studies and comparison of trends and range condition over time. Along with the studies an evaluation of other resources and management intensity will help determine capacity. Projections of livestock numbers in the Forest Plan are not all based on resource degradation, but on a level of management intensity that can be sustained with consideration for budget as well as other resource emphasis levels.

The determination of satisfactory or unsatisfactory management on a given allotment requires a knowledge of all resources impacting the land, and becomes somewhat subjective. Satisfactory management occurs on allotments where management actions are proceeding according to a schedule (allotment management plan) that will not permit regression in range condition or trend. Satisfactory management is somewhat different than range in satisfactory condition. Satisfactory range condition occurs on acres classified as fair or better using the R3 range analysis process. Subjective field evaluations of management are proper, and we will continue to make them. They are based on our most current information. Necessary validation of the most current information and periodic inspections are just good management.

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NMDA-10

We also cannot accept as scientifically valid and defensible USFS decisions based on these assumptions and methodologies. Selection of an appropriate carrying capacity appears to occur within a discretionary decision space bounded by biological carrying capacity on the upper end (if it is known) and some minimum administrative carrying capacity on the lower end. Between these two poles of the decision space, land managers will generate decisions that will determine allotment carrying capacities on the Gila National Forest. The resultant "approved" stocking rates will be administrative creations, not biological determinations. Their foundation will be agency guidelines such as the "Range Analysis and Management Handbook".

We suspect that the increase in forest carrying capacity noted on page 11 of the DEIS, and referred to as "a perplexing phenomenon" at the beginning of these comments, is in fact an administrative, not biological, accretion. As discussed earlier, adoption of certain USFS management strategies (such as rest-rotation grazing systems) can result in significant increases (albeit administratively determined) in percentage of allowable forage use. Consequently, it is possible the improvement in carrying capacity mentioned by the DEIS may be occurring within the discretionary decision space of the agency and not at the outer limits of biological potential.

We believe the best interests of the land and the livestock permittees are not served when management decisions are generated in the discretionary manner described above. In our opinion, correct management of the land resources of the Gila National Forest and appropriate concern for the livestock permittees whose livelihood is inseparable from the conservation of forest lands requires the highest levels of scientific accuracy and reliability in the determination of allotment carrying capacities. Proper stewardship of federal lands deserves no less.

C. Reliability and Appropriateness of Range Condition Measurements on the Gila National Forest

Range condition for the 2,308,393 acres of full capacity range in the Gila National Forest (by percentage acreage within each ecological condition class) is displayed on Table 18 of the DEIS (p. 71). The information presented in Table 18 represents a composite of allotment range condition classes. The accuracy and reliability of these measurements are extremely important, in our opinion. In particular, percentage allowable use, from which carrying capacity is partially derived, is predicated on ecological condition class. Recognizing the significance and importance of range condition measurements in the determination of forest carrying capacity, we have the following questions and comments concerning the derivation and use of ecological condition class in the Gila National Forest DEIS and PNFP.

We understand the utility of range condition measurements to be a function of, 1) the ecological information base upon which they are derived, and 2) the timeliness of the measurements in regard to their implementation in the decision-making process. A requisite ecological information base would include, in our opinion, scientifically supportable data on the primary soil-vegetation units that comprise forest allotments. Additionally, an acceptable information base would also contain information pertaining to vegetation production and composition potential for each of the identified soil-vegetation

units. Assuming the existence of such an ecological information base, range condition measurements would be made within these predetermined soil-vegetation land units. Allotment range condition would then be the composite of the ecological condition classes of the range sites comprising the allotment.

We agree the highest levels of scientific accuracy and reliability in the determination of allotment carrying capacities should be used. It is for this reason only a few allotment analyses can be completed each year and only a few increases or decreases can be made. The analysis process is a very in depth study into the forest ecosystem and conflict resolution. Some analysis may require up to one year to complete and several years to demonstrate the resource response. This leaves the art of range management open for many decisions that must be made between analysis intervals in support of good stewardship of federal lands. Grazing is but one use of the forage resource. There are a variety of uses/needs of this resource, and we must balance each use with all others.

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The DEIS and PNFP documents refer only to forest-wide range condition by primary vegetation types. However, we assume that equivalent information, from which forest-wide summarizations were made, are available for individual allotments. We would like to know how range condition measurements were performed for individual allotments. Specifically, we request information on the stratification of condition measurements within allotments by range site or some equivalent soil-vegetation unit. What ecological classification, if any, was used to delineate sampling units within allotments, how was the sampling performed, and what methods were used to evaluate collected data? The acceptability and utility of range condition information presented in the DEIS and PNFP documents is predicated on whether adequate ecological stratification of sampling was performed in conjunction with the availability of scientifically sound guidelines for the interpretation of collected data.

Vegetational units, as displayed on page 71 of the DEIS, do not constitute classification units comparable to soil-vegetation units. The latter are delineated by specific environmental parameters and have unique ecological and biological expressions. Any particular vegetational unit may be comprised of one or more fundamental soil-vegetation units. Consequently, range condition classes developed for broad vegetation types are not necessarily reliable. They tend to confound differences in multiple site potentials that frequently occur simultaneously within a single vegetational unit. We are concerned that range condition as developed by the USFS on the Gila National Forest and presented in the DEIS and PNFP is based on broad vegetative units. We find this unacceptable.

We note, however, that the USFS has developed capability areas for the Gila National Forest. Are those capability areas equivalent to ecological or soil-vegetation classificatory units and were they utilized in the determination of range condition as presented in the DEIS and PNFP? Production coefficients were apparently developed for capability areas (p. 192, DEIS). Does this infer that the USFS considers capability areas to be basic management as well as ecological units? If they are, what sampling methodologies and what periods of time were involved in the determination of production coefficients? More importantly, how do capability areas equate with individual allotments? Has the USFS delineated capability areas within allotments and does a methodology exist that permits conversion between these two disparate units? In our opinion, the DEIS and PNFP documents are seriously flawed to the extent that identification of procedures and methodologies concerning condition class determination on allotments and/or capability areas are omitted.

We are also concerned with the time period that may have elapsed between the measurement of condition classes within allotments (irrespective of other perceived methodological deficiencies) and their subsequent publication in the Gila National Forest DEIS and PNFP. The relevancy of range condition data diminishes significantly in proportion to the length of elapsed time. Realizing the inability of the USFS to perform more than several allotment analyses per year because of staffing priorities, it seems likely that range condition measurements for many allotments are sufficiently dated to raise the issue of their representativeness of current resource conditions on the Gila National Forest. If this is true, the information presented in the DEIS and PNFP concerning range condition is neither relevant nor suitable for utilization in the analysis of environmental alternatives and impacts or in the planning of forest activities. Therefore, does range condition data exist for each allotment, and if range condition data does exist, how old is it for each allotment?

The broader implication of unreliable range condition data, however, is the distortion it contributes to our understanding of the biological carrying capacity of the forest. In addition, inaccurate range condition data may also result in severe hardship to livestock permittees whose allowable stocking rates hinge on the outcome of range condition surveys. The impact on the federal forest lands can also be substantial if incorrect condition estimations result in inappropriate land management.

NMDA-11

The information you request concerning how range conditions were measured is explained in the Region 3 Allotment Analysis Handbook. We feel the process is adequate and reliable and provides the scientific accuracy required from the data to make sound resource decisions.

NMDA-12

Your concern with the methodology used to determine range condition by broad vegetative units is unfounded. Range condition data by vegetative types were used for each acre of land to determine AUM projections. Range coefficients were developed for each vegetative type within each climatic zone. Climatic zones were separated by vegetation types, temperature, elevation, and precipitation. AUM projections from the allotment analysis were used in the capability area, but not as you suggest, developed from the capability area. The procedures and methodologies are documented in the Outputs Technical Report available for review at the Forest Supervisor's Office in Silver City.

NMDA-13

Your concern with the age of the range condition data is a valid concern, and if data from existing analysis was used to make adjustments there could be some unfounded hardships to livestock permittees. We do, however, feel the data available in the allotment analysis concerning range condition is adequate to base management assumptions in the Forest Plan. The data collected over the years may not be representative of a given situation today; and if used to base stocking adjustments would as you suggest, cause "severe hardship to livestock permittees....". For this reason, we have stated in the standards and guidelines for each management area, that any livestock adjustment will be based on updated allotment analysis.

The reliability of existing range condition data for this analysis is good. Range condition indicators used by the Forest Service include plant composition, plant vigor, and plant density. The shift from one condition class to another is a very slow process in the southwest and is very dependent on management intensity. Changes in range condition in most cases cannot be measured within a five-year period, and in many cases the gradual change in range condition will take 20 years or more. We feel the range condition ratings as collected through the allotment analysis represents a satisfactory base along with other indicators to project outputs.

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In addition to the reliability of range condition data on the Gila National Forest, we also have questions concerning the consistency and appropriateness of the ecological range condition concept that is used in the DEIS and PNFP. Range condition is defined ecologically in the DEIS glossary as being "The state of the plant community on a range site in relation to the potential natural plant community for that site" (p. 173). The professed goal of the USFS in the DEIS and PNFP is to manage range resources to achieve amelioration of range conditions (p. 36, DEIS Summary). Attainment of excellent range condition, which corresponds to a sites potential vegetation, is the ultimate objective in the management of USFS rangelands.

Inconsistencies, however, are apparent in the USFS application and use of range condition. Some grassland and open woodlands in the Gila National Forest, for instance, represent preclimax or seral stages in terms of overstory tree development. Increasing density of timber on those sites will eventually result in establishment of potential natural vegetation. In response to this problem, the USFS has proposed in the PNFP to maintain 50,000 acres of grassland against encroachment by ponderosa pine and pinyon-juniper (p. 37). The encroachment of trees and their ecological impact on understory species (production and composition changes) is interpreted by the USFS as a decline in range condition even though it represents a successional development of vegetation toward climax on high ecological condition (pp. 103-104, DEIS). This interpretation of range condition is problematic insofar as it is divorced from a logical connection with ecological condition. It appears to us the USFS is using a condition rating system based more on forage value than ecological status in this particular situation.

Yet another inconsistency in the use of range condition in the management of the Gila National Forest is apparent in its application to wildlife management. The DEIS mentions the loss of forage and habitat for some species of wildlife, particularly in the wilderness areas, resulting from vegetational succession in the absence of natural fire (p. 70, DEIS). The PNFP outlines specific actions (i.e., prescribed burning) by management areas that would improve range conditions by maintaining vegetation at lower successional stages (which corresponds to a lower ecological condition) to provide suitable habitat and forage for selected wildlife species. Again, it appears to us the USFS is using a condition rating system based more on forage value than ecological status.

We believe the use of forage value as a tool for assessing land condition and suitability for specific uses is consistent with good resource management. We are perplexed, however, by the USFS insistence (despite actions to the contrary) in the DEIS and PNFP on managing rangelands, particularly those used primarily for livestock grazing, solely on the basis of ecological range condition. We realize the USFS depends on ecological range condition for determining percentage allowable use for forage. That should not, however, justify inconsistent or inappropriate applications of range condition to forest management. Furthermore, we are uncertain whether such linkage of allowable use factors to condition class is physiologically supportable as delineated in USFS range analysis documents and as applied to the grazing lands of the Gila National Forest.

It is paradoxical that a man-imposed use on rangelands (livestock grazing) should be managed by standards based on the absence of man and his associated zootic influences ("natural climax" that occurs with high ecological condition) whereas "natural" uses of rangelands (wildlife) is frequently managed by standards that recognize the necessity of deviating from climax or high ecological conditions. Despite this paradox, the Gila National Forest DEIS and PNFP, consistently describe alternatives, impacts, and plans in terms of achieving maximum ecological range condition for lands subject to livestock grazing. We believe reliance on ecological condition class is inappropriate for the management of some rangelands and is inconsistent within the context of other, nonlivestock management strategies presented in the DEIS and PNFP.

NMDA-14

The maintenance of 50,000 acres of invading Ponderosa pine into existing grasslands is not related to the question of range condition, but to other management objectives. The encroachment of trees and their ecological impact on understory species will, as you suggest, show a decline in range condition using a standard score card system. However, the management objective for these areas is maintenance of current forage production and vegetative diversity, and not a return to the ecological climax.

NMDA-15

Your concern with the FS use of ecological range condition ratings as a base for livestock management would be appropriate if that was the only indicator of the land to support livestock. In addition to range condition indicators; soils data; the relationship of livestock to other resources; the ability of the permittee to manage; and actual production utilization studies comparing livestock use to actual forage production will be used. Management of livestock and capacity is not based solely on ecological range condition as you suggest, but is only an indicator. We do agree that the current score card has developed from many years of field testing and is not a pure ecological rating or a forage production rating, but it serves as an indicator that appears to be working based on improved conditions.

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Therefore, we request the USFS clarify their current policy on the use and application of range condition measurements in the management of the Gila National Forest. Has the USFS developed different strategies to evaluate range condition and how do these strategies correspond to specific management goals (i.e., management for climax vegetation, management for livestock forage value, management for wildlife habitat, etc.)? If so, what are those strategies and management goals? If not, how does the USFS explain discrepancies noted above in the application of the range condition concept and, in particular, inconsistencies in its application to livestock and wildlife management?

In summary, the USFS proposes in the DEIS and PNFP to manage lands using range condition data that is, in our opinion, unsubstantiated and/or inappropriate under certain circumstances. We believe the effect of an uncritical adherence by the USFS to ecological range condition class and associated allowable forage use values may well be the establishment, as well as continuation, of improper livestock stocking rates on the Gila National Forest and the perpetuation of a management system that ignores biological carrying capacity in favor of a discretionary carrying capacity set by administrative fiat. In our opinion, the alternatives, environmental impacts, and plans delineated by the DEIS and PNFP documents are unacceptable to the extent their derivations are dependent upon questionable existing range condition estimations for the Gila National Forest.

D. Adequacy of Future Range Monitoring Programs

The USFS proposes to initiate a program to monitor grazing capacity in the Gila National Forest on approval of a final forest plan (p. 292, PNFP). Forage production and utilization studies would be performed at five-year intervals until permitted livestock use of forage is balanced with grazing capacity (p. 251, DEIS). We concur with the USFS in the importance of designing and implementing adequate monitoring programs to evaluate the effectiveness of forest plans and activities. However, we believe it is inappropriate to merely monitor grazing capacity when, in our opinion, its actual level remains unsubstantiated by conclusive and sound scientific data.

An accurate estimation of forest carrying capacity cannot be conclusively established on a monitoring schedule occurring at five-year intervals. Climatic variations occurring between measurement intervals and other confounding effects would render meaningless any comparison between or average of estimated carrying capacities forest-wide or by allotments.

We recommend an intensive monitoring program be established as previously discussed in Section II (a) of our comments. Following completion of this monitoring program and determination of allotment carrying capacities, a less intensive monitoring program, such as the one currently proposed by the USFS, would be acceptable, in our opinion.

We are, however, uncertain of the ability of the USFS to adequately perform these monitorings. Currently, the USFS is apparently capable of completing only a relatively few allotment analyses per year. In addition, stocking adjustments are limited to approximately one allotment per year (p. 22, DEIS Summary). The mathematics of the current management situation suggest appropriate monitoring of the existing 140 grazing allotments, and subsequent stocking adjustments, could involve a time period exceeding that envisioned by the PNFP. Indeed, the expectation that "permitted livestock use of the range forage resources is balanced with grazing capacity at least by the middle of Period 3," appears unrealistic in our judgment (assuming the correctness of the estimated imbalance).

We recommend the USFS completely revise the proposed monitoring plan as suggested above. We further recommend the USFS develop a convincing and realistic schedule for implementing the revised monitoring plan. We also urge the USFS to refrain from issuing final decisions on stocking rates until completion of monitoring programs and only after a review and careful and considered consultation, cooperation, and coordination with the parties involved (Section 8, PRIA).

NMDA-16

The monitoring of range outputs and effects identified in the draft Forest Plan (pp. 290-292) is accomplished at the allotment level and aggregated to a Forest total to determine consistency with the Forest Plan. Grazing capacity will be monitored by conducting production utilization surveys as prescribed in the Range Analysis and Management Handbook (FSH 2209.21, R-3; Chapter 50). The monitoring schedule will be at least at five year intervals on those allotments where permitted use exceeds grazing capacity. The duration of the survey may be one or two consecutive years to account for climatic variations. Where use is in line with grazing capacity, production-utilization surveys will be scheduled as shown on page 35 of the Draft Forest Plan. The monitoring plan will be revised to clarify this schedule.

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Completion of monitoring may not occur within the time frame preferred by the USFS. However, we believe the information generated by extending the monitoring period will offset potential disadvantages by providing a more sound basis for range management on the Gila National Forest.

E. Extent of and Rationale for Projected AUM Reductions on Gila National Forest Allotments

The Gila National Forest PNFP proposes a forest-wide net reduction in livestock AUMs amounting to approximately 10 percent of the current permitted use (363,744 AUMs) by the end of the fifth decade of the planning period (p. 23, PNFP). Actual reductions, however, could vary significantly, depending on the implementation of proposed range improvements (see Section II, G, NMDA Comments) and the particular planning decade in question. Failure of projected range improvements to materialize or mandated 10-year revisions in the final forest plan could result in further downward adjustments in AUMs. Although these reductions are subject to the results and interpretations of allotment analyses (p. 287-342, DEIS), the disproportionate impact and the severity of these cuts on many forest allotments is disturbing.

For instance, of the 38 management areas in the Gila National Forest (p. 49-205, PNFP), approximately 60 percent are scheduled for possible AUM reductions. Management areas targeted for cuts represent almost 58 percent of the 140 grazing allotments on the Gila National Forest. Proposed AUM reductions on these allotments alone average 27 percent of current permitted use. The PNFP does project AUM increases on several allotments not targeted for reductions. However, for every AUM added to forest-wide capacity by the USFS, four AUMs are eliminated. More significantly, 11 management areas, representing 47 of 140 grazing allotments, are scheduled in the PNFP for AUM reductions equal to or in excess of 30 percent. Some of these allotments could receive reductions in AUMs that exceed 60 percent (p. 235, PNFP).

We are alarmed by the magnitude of these reductions in allotment stocking rates, particularly in light of past livestock reductions that have occurred during the history of the Gila National Forest. We believe these proposed reductions represent an imminent threat to the livelihood of many permittees and to the long-term continuance of livestock ranching on the forest. Our concerns are based on what we perceive to be unsupportable justifications offered by the USFS in the DEIS and PNFP for anticipated AUM reductions.

Numerous justifications are offered by the USFS for the proposed reductions in allotment stocking rates on the Gila National Forest. "Resource degradation due to overstocking and/or the lack of proper management" is a principle reason given by the USFS for reducing AUMs on 52 forest allotments (p. 22, DEIS Summary). However, we have already pointed out in Section II.B of these comments that "resource degradation" has not been substantiated by the USFS. Moreover, the linkage of resource degradation to proper management raises the question of cause and effect. Has resource deterioration occurred because of improper management or has the USFS inferred resource degradation because of the assumed lack of proper management? Also, the assertion that overstocking is occurring corresponds to the USFS allegation that permitted use exceeds carrying capacity forest-wide. We have expressed our concern over the validity of carrying capacity figures for the Gila National Forest (Section II A, NMDA Comments). Until adequate data are presented by the USFS, assertions of overstocking or inadequate carrying capacity on the forest must remain in the realm of speculation or conjecture, not fact.

The USFS refers to the management of fragile lands as necessitating reductions in AUMs. This may be true. However, the USFS has made no effort in the DEIS and PNFP to describe, identify, and locate these lands, to delineate their management problems and to substantiate implied allegations that current stocking rates are resulting in declining forage yields and accelerated erosion. In the absence of

The magnitude of projected adjustments in AUM's forestwide from the existing 363 thousand to 350 thousand represents only a nine percent reduction. This may be decreased or increased based on allotment specific analysis, on permittee investment, and actual conflicts with other resources.

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In response to the AUM reductions in the Forest Plan and their impact on the local livestock industry, we agree there will be adverse impacts. Projected data indicating adjustments in livestock numbers are based on best available data and the desired management emphasis for that area. The existing allotment analysis has resulted in identifying some areas of resource degradation due to the lack of management intensity to protect fragile soils, areas where conflicts with other resources exist, or areas where range conditions are poor. Documentation again is based on expected analysis practices and 50 years of close observation by trained range management professionals. In as much as the art and science of range management is not exact, we must conclude our projected adjustments are within the scope of our knowledge and supported by existing data. The fact that it may take several years to complete a forest plan and management conditions do change over time make it necessary to update our analysis and evaluate current management prior to adjusting livestock numbers upward or downward. It is stated in the prescriptions for each management area that any adjustment in livestock numbers will be based on an updated allotment analysis. If specific problems are identified, they can be addressed at that time. Adjustment will not be based on projections in the Forest Plan but through a coordinated plan that considers all impacts, long term Forest objectives, and permittee needs.

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contrary evidence, we must conclude that the problem of fragile lands is a minor consideration in the USFS decision to downwardly adjust livestock numbers on the Gila National Forest

Another motivation underlying the USFS decision to reduce stocking rates on selected allotments is agency concern for lands in less than fair condition. We believe the USFS does not have adequate range condition information to identify allotments or portions of allotments that are in poor ecological condition (Section II C, NMDA Comments). Additionally, reliance on range condition data alone to determine the need for stocking adjustments is not appropriate, in our opinion. Not only is the USFS application of range condition, as a management tool, ambiguous and inconsistent within the DEIS and PNFP, but the conspicuous absence of supporting trend data limits the utility and applicability of range condition as a significant factor in the management of the lands of the Gila National Forest.

The USFS also considers existing conflicts between wildlife and livestock sufficient cause to reduce AUMs on certain allotments. This issue is treated in detail in Section II J and K of these comments. However, we can summarize these comments by reiterating our belief that the USFS has not adequately documented the nature, extent, and seriousness of these presumed conflicts. Until such documentation is provided, we cannot support the USFS decision to curtail livestock grazing on the basis of alleged wildlife-livestock conflicts.

A related justification for the reduction of AUMs on the Gila National Forest is the USFS desire to allocate additional forage and habitat to wildlife to encourage population expansion of certain species. This decision assumes forage and habitat are the principal limiting factors associated with these wildlife populations in the forest. To assume such reallocations of resources to wildlife will be either effective in promoting population growth or even used by targeted species is speculative at best. Section II J of these comments discusses the technical ramifications of this issue in detail.

Our primary concern in the issue of forage and habitat reallocation, however, is not technical. We believe the USFS decision to reduce livestock AUMs for the purpose of expanding already viable (p. 56, DEIS) populations of wildlife is a violation of the intent of the Multiple Use and Sustained Yield Act of 1960 (MUSYA) and the Forest and Rangeland Renewable Resources Planning Act of 1974 (RPA). MUSYA directs the Secretary of Agriculture "to develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom" (Section 2). RPA reaffirms this directive by also providing, "for multiple use and sustained yield of the products and services obtained... from the national forests (Section 6.e). Forage, livestock, wildlife, and recreation are major products and services obtained from the Gila National Forest. In our opinion, the language of MUSYA is explicit in directing the Secretary of Agriculture to sustain the yield of these products and services. However, the effect of the USFS proposed reallocation decision will be to decrease the amount of forage permitted to livestock, thus reducing the yield of livestock. Conversely, the proposed reallocation will potentially augment the amount of forage available to wildlife and, if successful, expand the yield of recreational services to the general public.

If the proposed decision to reallocate livestock forage was based on the necessity to preserve or maintain existing wildlife populations, the USFS would have justification for adjusting AUMs. This is not the case, however. The USFS is explicit in the discussion of DEIS alternatives and the PNFP that their goal is to increase wildlife populations above current levels, despite the viability of existing populations (p. 56, DEIS). The proposed action for Management Area 7E, for instance, entails a 60 percent reduction in livestock AUMs and a 90 percent increase in wildlife AUMs (p. 331, DEIS). We believe these actions do not comply with the intent of MUSYA. A 90 percent increase in wildlife and a 60 percent decrease in livestock AUMs cannot be construed as an example of sustained yield.

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We feel that you have misinterpreted sustained yield, as described in MUSYA and RPA. You stated in your response that a reduction in livestock grazing violates these laws. It appears that you felt that, all resources must be produced at present levels or above.

Sustained yield is defined in the glossary as "The achievement and maintenance in perpetuity of a high level annual or regular periodic output of the various renewable resources of the National Forest without impairment of the productivity of the land." The Proposed Forest Plan produces a sustained yield of renewable resources on the Forest because it establishes a level of output of renewable resources that can be produced over time without reducing the ability of the land to produce that resource. In some cases, reductions must be accepted in order to prevent long term adverse effects to the environment. This is the situation with grazing.

Your line of reasoning, if followed to a logical conclusion, would reduce the Forest plans to little more than a restatement of the status quo. The needs and desires of various publics would be ignored in the development of plans. In your response to the DEIS and Proposed Plan, you emphasized the need for public participation in the planning process and the need to provide for adequate review and analysis of the documents. If the Forest is not allowed to produce outputs of goods and services in accordance with public review and analysis, the public is essentially removed from the process. This is obviously not the intent of Congress.

In your comments you include the statement "The sheer force of numbers of users should not be the deciding factor in the allocation of scarce resources any more than the number of cattle or wildlife should be the determining factor for the allocation of finite forage resources". We feel that the needs of Forest users should be subordinated to protection of the environment, but with this constraint, resources should be allocated to benefit as many people as possible.

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We recognize the growing demand for recreational uses of wildlife and we understand the pressures to which the USFS is subjected in providing for such demand. However, multiple use on a sustained yield basis should not and cannot be sacrificed to the expediency of satisfying only one of many uses of the Gila National Forest. More importantly, if the USFS can justify reducing AUMs in the current plan, what will prohibit them from making even more reductions in the future? At what point will the USFS cease reductions for this purpose; or, is livestock fated to disappear from the Gila National Forest altogether? We believe sustained yield is the only objective and acceptable yardstick available to the USFS in balancing the conflicting demands of forest users. The sheer force of numbers of users should not be the deciding factor in the allocation of scarce forest resources any more than the number of cattle or wildlife should be the determining factor for the allocation of finite forage resources.

Unless the USFS adheres to the principle of sustained yield and revises the Gila National Forest DEIS and PNFP documents accordingly, many allotments receiving AUM reductions may cease to be viable economic units for livestock operations. It is our understanding the intent of Congress in passing MUSTA and RPA was not to propel land management agencies toward single use. Yet, the effect of proposed USFS reallocation decisions on the Gila National Forest will achieve precisely that outcome. We cannot accept this abridgment of federal laws nor can we condone the destruction of ranching units through the slow but relentless attrition of livestock AUMs.

The final justification offered by the USFS for reducing livestock numbers on allotments within the Gila National Forest is the predicated obsolescence of existing range improvements. Except for areas of the forest scheduled for implementation of new range improvements or maintenance of old ones, "Management on the remainder of the forest will result in declining capacity over time as unimproved improvements deteriorate" (pp 7-8, Alternatives A, PA, B, C, D, E, F, DEIS Summary). We cannot accept the USFS assumption that livestock carrying capacity will necessarily decline simply because federal monies are unavailable to halt the deterioration of range improvements. To the contrary, the DEIS Summary suggests improvements will not deteriorate under the proposed action alternative because "Funding will be adequate to maintain existing range improvements and sustain current management intensity" (p 36, DEIS Summary). Even if funding is unavailable or inadequate, as implied by the USFS in other sections of the DEIS and PNFP (pp 7-8, DEIS Summary and pp 49-285, PNFP), we see no reason to believe that deterioration of range improvements and associated declines in carrying capacity will be inevitable.

Nevertheless, the PNFP projects a decline in management intensity under current management directions resulting from a loss of existing range improvements such as interior division fences, stock water developments, and containment of woody-species invasion (p 11, PNFP). The result of these "deteriorations", according to the USFS, is reduction in grazing capacity over time. We believe that the USFS has omitted a feasible alternative in the assessment of alleged deteriorating range improvements on the Gila National Forest. Specifically, we believe the USFS has failed to take account of the probable contribution of forest permittees toward the maintenance of existing range improvements on their allotments.

We believe most permittees would find it in their self-interest to maintain fences and water developments. Indeed, it is unlikely permittees would readily abandon stock water developments or leave interior fences in disrepair if the result would be loss of forage and subsequent reductions in allowable livestock. We would like to know if the USFS has, 1) considered voluntary contributions from permittees, for the purpose of maintaining range improvements, as compensatory factors in the development of DEIS alternatives, 2) suggested to permittees, in a format other than the "management emphasis" sections of the written management area plans (pp 49-285, PNFP), that voluntary contributions toward range improvement maintenance could prevent projected AUM reductions, and 3) actively

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The projection of AUM's is in part based on the Forest Service's inability to reconstruct all livestock handling facilities over time under current funding constraints. We disagree with your contention that permittee contributions to range improvement investments were not considered. Permittee investments into range improvements have averaged around 23 percent of the total improvement cost. The assumption that permittee investments will continue at current levels was programmed into the AUM projections. This assumption is based on the economics of each ranch operation and their ability to contribute funds. The projections in AUM's shown for each management area are only projections and the ability to sustain AUM's can depend on each ranch operations economics.

For this reason the Forest provided for permittee investments to offset projected losses due to facilities decline if conflicts with the proposed management emphasis can be avoided. The increased management intensity or increased funding from the permittee above the 23 percent will be evaluated in the allotment analysis on an individual basis.

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encouraged permittees to increase the ratio of private to public investments on forest allotments? If the USFS has not, we would like to know why

We would also like to know why, "Under the current [management] prescription, allotments with minimal natural water will decline in [carrying] capacity" (p 20, DEIS)? Unless these allotments are already overstocked, we can find no justification for this statement. The only rationale we can envision is the assumption that these allotments, having excessive reliance on developed water, would be expected to decline in carrying capacity as water improvements deteriorated. The validity of this assumption is dependent on, 1) the existence of developed waters in such allotments and their relative contribution toward proper forage utilization, and 2) the inability or lack of willingness by permittees to maintain those developed waters with private investment. In our opinion, this assumption is not valid. Moreover, it has not been substantiated in the Gila National Forest DEIS and PNFF documents.

The USFS does state in the management emphasis section of several management area plans (pp 49-285, PNFF) that "Permittee investment may be used to partially sustain permitted numbers at some level above that indicated for the fifth decade if conflicts with wildlife can be avoided." We find that statement unnecessarily vague and difficult to interpret. In relation to management areas subject to proposed AUM reductions, the only guide for permittee investment appears to be the avoidance of conflicts with wildlife. This raises several questions. Who will determine the existence of these conflicts and how will they be detected, measured, and assessed? Furthermore, what limits, if any, will the USFS impose on permittee investments? Would the USFS be agreeable to private investment by permittees of Management Area 2D, for instance, that would negate the proposed 40 percent reduction in AUMs (p. 67, PNFF)?

Even if the USFS allowed sufficient permittee investment to overcome AUM reductions, we perceive other obstacles that might prohibit such investment. As an example, AUM reductions of approximately 30 percent are proposed for Management Area 6D (p 203, PNFF). Provisions are included in the management area plan to allow for compensatory permittee investment. However, the plan for Management Area 6D indicates permitted use for livestock may fall low enough in some allotments that range improvements will cease to be fully utilized (p. 203, PNFF). If this occurs, there will be no need for additional permittee investment on those allotments until underutilized improvements are once again used to full capacity. The problem, as we see it, is how will the permittee achieve full utility of existing improvements without first increasing the number of livestock on his allotment? This will be difficult, if not impossible, to accomplish unless the USFS rescinds the initial decision that brought about AUM reductions in the first place. The USFS has created a "Catch-22" situation that may effectively block permittee investment on certain forest allotments.

Additionally, the provisions of many management area plans state permittee investment can be used only "in part to sustain permitted numbers at some level above that indicated for the fifth decade" (p 29, PNFF). What does the USFS mean to infer by the phrase "in part"? Does it imply that the USFS discourages or will not allow permittees to invest fully in range improvements to offset livestock reductions? Or, does it mean permittees will not be allowed to fully recover lost AUMs through private investment? The PNFF does not provide answers to these questions.

The PNFF is also vague on the extent to which permittees can make additional investments on allotments for which the USFS has already proposed increases in livestock use. Allotments within Management Area 3D, for example, are scheduled for an average AUM increase of 15 percent above current use. The management area plan for these allotments does allow permittee investment for the purpose of further augmenting livestock AUMs provided that "conflicts with wildlife can be avoided" (p 114, PNFF). Again, we reiterate the same concerns

NMDA-21

Areas with natural waters will require less costs to maintain existing high management intensity than areas supporting an abundance of man-made waters. The assumptions used to project future AUM's under current funding levels include a decline in capacity over time. This decline is based on the Forest Service's inability to reconstruct livestock facilities as they reach their designed life. As stated above, the ability of each permittee to invest beyond the 23 percent level is unknown. The actual permittee investment and its effect on the level of management must be determined as well as the corresponding capacity that level of management indicates in the individual allotment management plans.

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expressed earlier in this section of our comments. By whom and how will these "conflicts" be monitored? Also, how much discretion will the permittees have in determining how his private funds will be invested and the levels at which he can sustain AUMs above PNFP projected numbers?

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One obvious benefit arising from permittee investment, whether to augment AUMs above current levels or to maintain those threatened by reduction, is the expansion of grazing fee receipts above the amounts anticipated in the PNFP and the subsequent increase in range betterment funds. Simply put, private investment begets public funds for additional investment on forest rangelands. This optimistic scenario suggests the critical importance of USFS estimates of carrying capacity on the Gila National Forest.

If permitted numbers on the forest are below biological capacity (which can only be determined by appropriate monitoring - see Section II A and B, NMDA Comments), an opportunity exists for generating valuable funds for the future management and conservation of grazing lands on the Gila National Forest. By reformulating permitted numbers on the basis of biological, and not administrative, carrying capacity (see Section II B, NMDA Comments), range betterment funds would be maximized. This additional accrual of public funds, in conjunction with "encouraged" permittee investment, would then trigger a multiplier effect on range improvement investments resulting in the extension of the boundary of forest biological carrying capacity. In turn, resource values would be enhanced and land stewardship facilitated.

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We recommend the USFS consider this scenario as a feasible alternative in the development of management plans and activities for the PNFP. In particular, we urge the USFS to carefully reevaluate livestock carrying capacity on the Gila National Forest. The costs of basing stocking rates on administrative, rather than biological, carrying capacity are simply too high. Not only does the USFS fail to achieve levels of forest outputs (AUMs) that are sustainable by forage resources, it also fails to maximize the public and private funds that are required, and easily obtainable, to manage and conserve the natural resources for which the USFS is the mandated steward.

Accordingly, we believe it is imperative that the USFS deal adequately with the issue of private investment in the formulation of alternatives and in the development of a national forest plan. The failure of the USFS to do so until now has impaired the credibility of the current DEIS and PNFP documents. The issue of private investment, however, is secondary to the issue of credible estimates of forest carrying capacity as previously noted. Despite our conviction that private investment by permittees is a feasible alternative to PNFP projections of livestock reductions, we remain unconvinced by the DEIS and PNFP documents that private investments are needed to realign permitted use and biological carrying capacity on the Gila National Forest.

We are concerned that private investment, to the extent it is included in the PNFP, may be used to align permitted use with administrative carrying capacity, not biological carrying capacity (Section II B, NMDA Comments). Under this circumstance, permittees would be paying for AUMs already in existence biologically. Accordingly, the issue of private investment for range improvements to maintain current livestock numbers on the Gila National Forest must be predicated upon the meaning and accuracy of existing estimations of allotment carrying capacity. If there is to be private investment by permittees, it should be expended on the expansion of biological carrying capacity and not the artificial expansion of what the USFS has administratively determined to be proper stocking rates.

NMDA-22

The question with how and by whom will conflicts be monitored is addressed in the monitoring plan for all functions, including wildlife. The responsibility to manage forest ecosystems for the level of goods and services outlined in the Forest Plan remains that of the Forest Service. The level of AUM's sustained from permittee investment will depend on its impacts to other resources uses and activities.

NMDA-23

We agree that a decrease in AUM's will decrease the amount of range betterment funds received by the Forest Service. We also agree that increased private investments made for range improvements may be necessary to sustain a higher level of management than proposed in the Plan. We must not, however, lose sight of the Forest Service's objective to produce goods and services to meet future demands. Regardless of where the funding comes from, the management intensity (administrative capacity) will be based on the resource ability to produce, resource demands and conflicts. If less AUM's are grazed on the National Forest resulting in improvement in the overall management of the land for all resources, despite less range betterment funds, we will proceed in that direction.

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F. Issues and Concerns Related to Projected AUM Reductions in the PNFP

Although the severity of proposed reductions in current permitted AUMs vary according to the alternatives in the DEIS, the following comments pertain specifically to issues and concerns associated with stocking rate adjustments that are projected in the PNFP. Deficiencies have already been noted in the several justifications offered by the USFS for decreasing allowable AUMs below current levels (Section II E, NMDA Comments). Additional deficiencies are discernable in the analysis of such related issues and concerns as, 1) wilderness impact on stocking rates, 2) biases and assumptions in proposing AUM reductions prior to allotment analyses, 3) failure of the PNFP to specify implementation guidelines for livestock adjustments on forest allotments, and 4) impacts resulting from major reductions in allotment stocking rates

- 1 The USFS notes that a decrease in natural habitat on the Gila National Forest has occurred in " wilderness areas where reduced fire occurrence has interrupted the natural maintenance and creation of early successional [vegetational] stages" (p 70, DEIS). This decrease in habitat has adversely impacted, or will impact in the future, the ability of wilderness areas to support certain game and nongame species. We are concerned the USFS is relying on this trend in wilderness habitat to justify reductions in livestock AUMs on wilderness and adjacent, nonwilderness allotments.

If substantiated, this action and its justification signify, in our opinion, a continuing disregard by the USFS for Congressional intent in establishing the Wilderness Act of 1964 and a relinquishment by that same agency of duties and responsibilities delegated to it for the management of national forest lands.

In response to initial, nation-wide attempts by the USFS to curtail livestock grazing on designated wilderness lands, the U S House of Representatives' Committee on Interior and Insular Affairs issued two reports during the 95th Congress which provide guidance on the interpretation of Section 4 (d)(4)(2) of the Wilderness Act. The two reports of the Congressional Committee stress that the language of Section 4(d)(4)(2) of the Wilderness Act " means that there shall be no curtailment of grazing permits or privileges in an area simply because it is designated as wilderness" (HR 95-620, p 5 and HR 95-1321, p 7). Additionally, a third House Report (HR 96-1126) states that wilderness designations should not " be used as an excuse by administrators to slowly 'phase out' grazing." Indeed, the report continues, "It is anticipated that the numbers of livestock permitted to graze in wilderness would remain at the approximate levels existing at the time an area enters the wilderness system" (p 22).

Accordingly, we request the USFS provide NMDA and the general public with information pertaining to current stocking rates on wilderness allotments as well as stocking rates for those same allotments prior to wilderness designation. This information was requested by NMDA almost 2 1/2 years ago (Attachment VII). No written response has been received to date. A recent follow-up by telephone revealed that the information was not accessible in a useable format. If this is true, what inference should we make concerning the format and accessibility of other data taken from these same allotments and used in the development of the DEIS and PNFP? Does this, in the opinion of the USFS, impugn the accuracy of measurements such as carrying capacity and range condition made for these allotments? In addition, we request that the USFS comment on our allegation that wilderness designation has been used directly or indirectly in the DEIS and PNFP to justify reductions in AUMs on allotments occurring within or adjacent to the Gila, Aldo Leopold, and Blue Range wilderness areas.

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Grazing in the wilderness as well as outside the wilderness is an approved practice. There has never been an attempt to decrease stocking rates on wilderness or in adjacent nonwilderness allotments because of wilderness. Any reductions that have been made were made for resource reasons. Procedures used to evaluate livestock impacts remain the same inside or outside the wilderness area. When comparing wilderness allotment stocking rates prior to wilderness classification with those of today, the rates are relatively unchanged. Actual data as requested on the animal months of grazing prior to wilderness and current stocking rates has been forwarded to you.

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Allotments within Management Areas 5A, 7F, and 7G exemplify our concern. Ten grazing allotments, representing over 30,000 AUMs, comprise these management areas. All ten allotments fall within, or occur in close proximity to, designated wilderness. AUM reductions varying from an average of 30 percent to 60 percent are projected in the PNFP for those allotments (pp 150, 235 and 243, PNFP). Actual numbers of AUMs cut could exceed 14,500 (nearly 50 percent) following USFS planned allotment analyses. In each instance, the professed goal of the USFS in downwardly adjusting livestock numbers in these allotments is to "Manage herbaceous forage and cover habitat on these areas to provide for quality and quantity wildlife habitat at a level above what currently exists."

The conversion of livestock AUMs to wildlife AUMs on wilderness and adjacent nonwilderness lands contravenes the intent of Congress in the Wilderness Act of 1964. We also believe the USFS cannot justify this conversion of AUMs by suggesting that forage and habitat for existing wildlife (or proposed increased populations of wildlife) is incompatible with the continuance of livestock grazing at current levels. First, the USFS has no reliable information, in our opinion, that pertains to the adequacy of wildlife forage and habitat or to existing levels of wildlife populations (Section II J and K, NMDA Comments). Therefore, the USFS contention that conversions are necessary is unsubstantiated in the DEIS and PNFP.

Secondly, the current degradation of wilderness areas, in terms of suitability for wildlife habitat, cannot be attributed to livestock influences. If habitat and forage in wilderness areas have sufficiently declined to threaten existing wildlife populations, the USFS must assume full responsibility. The interruption of "the natural maintenance and creation of early successional [vegetational] stages" (p 70, DEIS) has been the result of fire control activities by the USFS in the past. By curtailing the impact of fire on wilderness areas, the USFS has created the very conditions it now uses to justify removal of livestock from forest lands. Ecologically unsound management in the past should not be the keystone for continued ecologically unsound management in the future. We strongly oppose the attempt by the USFS in the Gila National Forest PNFP to depopulate wilderness areas of livestock and to penalize adjacent nonwilderness allotments through AUM reductions for past agency management failures.

2 The PNFP repeatedly states "exact permitted livestock numbers will be established through standard allotment analysis procedures" (p 227, PNFP as an example). We support and encourage the USFS to postpone decisions on permitted livestock numbers until appropriate studies are made and agency compliance with Section 8 of FPLA is completed. We are concerned, however, that the USFS has already determined approximate levels of AUM reductions, as presented in the PNFP, in advance of and with indifference for monitoring results and Section 8 compliance.

We have found it difficult not to reach this conclusion in view of the percentage AUM reductions included in each detailed management area plan in the PNFP. Unless the USFS has already completed timely and scientifically defensible "standard allotment analyses", we see no basis, other than arbitrary or subjective ones, for the projection of stocking rate adjustments in advance of monitoring results. Our greatest concern is that proposed or projected AUM adjustments, whether downward or upward, may become self-fulfilling prophecies. This should be avoided at all costs. Changes in stocking rates, regardless of direction, should reflect the current biological carrying capacity of the Gila National Forest. DEIS and PNFP documents should not be biased by the inclusion of undocumented and unsupportable assumptions of resource potential. The purpose of these documents, in our opinion, is to provide factual information on which reasonable analyses can be performed.

Wilderness grazing and stocking rates are not exempt from impacts from other resource uses or activities. Wilderness classified lands create their own factors such as non-motorized access and the lack of vegetative control practices that could help sustain livestock numbers. The trend in wilderness areas is one of increased woody vegetation and less vegetative diversity and forage productivity. When the forage base declines as it has in the past, our forage projections for the future also decline. If overall management direction, resulting from improved fire management, can improve forage and habitat in the wilderness as well, less impacts to the livestock operator would be expected.

NMDA-26

Livestock numbers projected in the Forest Plan are only projections. Actual adjustments will be in line with agency standards and in compliance with regulations, as discussed in Comment No. 010-12. Your concern with the projected numbers becoming self-fulfilling is contrary to our management objective and our commitment to work with the permittees.

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Accordingly, we recommend that the management area analyses in the PNFP be revised to exclude unsubstantiated projections of AUM adjustments. This revision can be accomplished by reserving to the USFS, in each management area plan, the right to adjust livestock numbers on completion of analysis of monitoring data and following careful and considered consultation, cooperation, and coordination with livestock permittees and other interested parties.

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In response to your concern, the projectal capacity information has been taken out of the management emphasis descriptions. We feel, however, that this information is needed to help provide management direction. As a result we have added the data to a standard and guideline. We have clarified the fact that this is an approximate number and that capacity above this level is possible.

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- 3 The PNFP is specific on proposed AUM reductions within management areas. However, the PNFP neglects to specify guidelines for the implementation of stocking rate adjustments within affected allotments. The timing of adjustments is particularly important to permittees whose allotments are scheduled for reductions in AUMs. Will reductions be implemented immediately or spread over one or more decades? The livestock permittee cannot effectively plan his economic activities without some level of predictability and confidence concerning future access to forest AUMs. As the PNFP is now formulated, uncertainty on the disposition of permitted AUMs is the best the livestock permittee can expect from the USFS. Sophisticated plans, such as the Gila National Forest PNFP, should offer more than uncertainty and unpredictability. Stewardship of forest lands requires at least that degree of responsibility. Consideration for forest users requires no less.

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Implementation of the Forest Plan will start with Plan approval. However, increases or decreases in livestock numbers (to balance capacity with obligation) will be accomplished within the first two decades. Allotment analysis, the validation process used to determine actual livestock numbers, is an on-going process that varies with budgets and environmental situations. Should a reduction in livestock numbers be supported through the analysis process, the implementation will be accomplished through a coordinated effort between the permittee and the Forest Service to minimize the economic hardship while meeting the resource management objective for the area. Adjustments are routinely scheduled over a period of years to minimize the economic hardships often involved. The analysis process may indicate that the AUM projections are correct, or that the capacity and the obligation need no adjustment. Regardless of the results, the Forest Service responsibility to blend resource activities and uses to meet public demands will guide the implementation process.

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We are also dismayed with the PNFP's failure to describe how reductions in AUMs will be distributed among allotments within a common management area. Will reductions be proportioned equally among allotments or will they occur disproportionately on a few within a particular management area? If reductions are made proportionately, then a maximum number of allotments will be affected by the PNFP. However, if the reductions are made disproportionately, some allotments may receive downward adjustments in AUMs that exceed those projected for the management area as a whole. Management Area 7F is an example (p. 235, PNFP). AUM reductions applied to only four of the six allotments in 7F, for instance, would result in 90 percent diminishment in allowable livestock in each of the affected allotments. We have no doubt of the serious economic impact a 90 percent adjustment in permitted numbers could have on a livestock permittee.

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Livestock adjustments intended to make capacity equal to obligation will be determined on each individual allotment within the management area. The role of Forest planning is to provide management direction and program emphasis. More specific planning will take place and will include an environmental assessment and economic analysis for individual allotment management plans. The allotment management plan will be guided by the direction in the Forest Plan in a given management area. Actual adjustment will depend, as stated above, on the ability of the land to produce, conflicts with other resources, the permittee's management skills, and economics. In many areas conflicts have been resolved through adjustments in AUM's, others through a change in management intensity. We do not intend to change our working strategy with the permittee to achieve our common goal.

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The absolute level of AUM adjustments forced on an affected permittee is only part of the total economic impact. The severity of that impact is partially predicated on the manner in which reductions are implemented once the USFS decides they are necessary. Will the adjustments be made at once or "phased-in" over several years to alleviate economic hardship to permittees? We are surprised that the PNFP makes no mention of this potential problem. In addition, will the USFS consider extenuating circumstances in the enforcement of AUM reductions? Specifically, would the USFS modify the severity of stocking adjustments (through time or by quantity) to avoid extreme economic, social, or cultural hardships on affected permittees, their families, and their communities?

These issues are of particular concern to NMDA. In our opinion, the manner in which the USFS addresses them will affect the future of public land ranching in the Gila National Forest. Accordingly, we recommend these issues and problems be addressed and incorporated in a revised DEIS and PNFP.

- 4 The USFS has failed to recognize in the DEIS and PNFP the potentially adverse impact that proposed AUM reductions will have on the future stewardship of the lands of the Gila National Forest. On severely impacted allotments, for instance, AUMs may be diminished below the level required for conserving the economic viability of those land units. If this occurs, permittees may choose to vacate their allotments to reduce costs and to avoid additional financial losses in their livestock operations. This could contribute to increasing the number of existing non-obligated allotments on the Gila National Forest.

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The Forest is aware of the significant contribution made by individual permittees in constructing and maintaining improvements. The Forest also considers additional voluntary contributions by permittees. The extent and variability of cooperation by permittees is so site specific that it cannot be generalized in the Forest Plan. We recognize there is a potentially adverse impact to some permittees if the projections for future stocking rates materialize. The economic hardship on the rancher is always considered; however, the paramount issue is to maintain or improve the Forest resources and balance permitted livestock use with capacity. There are several methods of accomplishing good stewardship and improved management to ensure that livestock use is conducted under the principles of sustained yield management as required by the Multiple Use Sustained Yield Act. Future demands for the limited resources on the Gila make it necessary to manage as cost effectively and efficiently as possible.

The impact, however, would extend beyond the accumulation of unused grazing allotments. In our opinion, livestock permittees

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are the principle stewards of grazing lands on the Gila National Forest. Unlike most USFS technicians and managers, livestock permittees are with the land constantly, observing it, working it, treating it, and most of all, conserving it for their future use and that of their children. The management and conservation services they have given to the land in the past and the stewardship role they offer in the future, and which is now threatened, are factors largely ignored by the USFS in the DEIS and PNFP documents.

We believe the USFS, and the nation, cannot afford the loss of these voluntary managers and stewards of the grazing lands of the Gila National Forest. Therefore, we urge the USFS to reevaluate, in light of the needs of the land and the contributory role of the livestock permittee, the need for and the impact of what we have already termed unsubstantiated AUM reductions. In our opinion, the continuation of the historical trend of reducing AUMs on the Gila National Forest, as proposed in the PNFP, has severe implications for the environmental well-being of our forestlands and for the conservation of the resources obtained from them on a sustained-yield basis. Continuation of this trend will eventually eliminate the most immediate and most effective management tool available to USFS personnel: the livestock permittee.

G. Proposed AUM Increases Associated With Projected Range Improvement in the PNFP

The PNFP proposes increases in carrying capacity on a minority of the 140 allotments on the Gila National Forest. Approximately 35 allotments are candidates for potential AUM increases that will average 10 percent (pp 49-285, PNFP). We are encouraged by the USFS's willingness to upwardly revise carrying capacity for allotments currently understocked. However, we question the significance of the 10 percent increases that are projected by the USFS over a 50-year period when, in fact, revisions of the PNFP may occur every 10 years during the planning cycle. More importantly, the PNFP fails to inform affected permittees of the decade(s) in which to expect the 10 percent average increases in AUMs. The fifty-year planning period encompassed by the PNFP exceeds the expected life of almost all current permittees on the Gila National Forest. Consequently, we view the USFS proposal to augment the AUMs of certain allotments to be more of an allurement than a realistic change in current management.

We have additional reasons for questioning the significance and realism of the USFS proposed AUM increases. These increases are predicated upon the availability and investment of federal funds for the implementation and/or maintenance of structural and nonstructural range improvements and the development of new management strategies. However, current federal budget deficits, combined with probable decreases in range betterment funds (resulting from depressed livestock market conditions, proposed AUM reductions, and a possible increase in the number of empty allotments) suggest that sufficient funds may not be available in the future to achieve planned levels of range improvements. If this happens, net AUM reductions forest-wide will surpass USFS estimations presented in the DEIS and PNFP.

Surprisingly, the USFS has rejected a reduced budget alternative because it was not responsive to forest-wide issues and concerns (p. 16, DEIS). Although we can appreciate the USFS's desire to maintain present budget and management levels, we do not believe it is realistic to automatically assume, as the DEIS and PNFP have, a continuation of current funding. Indeed, it may be more realistic to assume the ratio of permittee investment to federal investment for range improvements will significantly increase rather than remain relatively static, as assumed by the USFS in the 50-year planning period (p. 104, DEIS).

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Projected outputs in AUM's whether increases or decreases, are not locked in. They are dependent on funds, cooperation, and the on the ground resource situation. Individual allotment management plans are prepared to address the issues and concerns. On an opportunity basis they are funded and completed. Actual accomplishment cannot be pinpointed because we are not in control of the quantity of funds for such developments or other issues that may delay the process. As you suggest, depressed livestock market conditions and reductions in AUM's will reduce funds available to achieve planned levels of management. This may cause the actual AUM's to decline below the projected levels.

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Our concerns, however, extend beyond the practicality and feasibility of range improvement funding and associated increases in livestock numbers. The USFS notes in the DEIS that "range betterment funds will be the only funds available for construction and reconstruction of range improvements" (p. 20, DEIS). Furthermore, priority for the allocation of range betterment funds will be "the reconstruction of facilities which will yield the greatest AUM returns" (p. 20, DEIS). This last statement by the USFS is particularly alarming.

Section 403 (b) of FLPMA authorizes grazing advisory boards "to offer and make recommendations to the head of the office involved concerning the development of allotment management plans and the utilization of range betterment funds." The prioritization procedures proposed by the USFS in the DEIS directly defy the word and intent of the preceding statutory provision. Reliance on benefit/cost ratios alone to prioritize range improvements will effectively exclude grazing advisory boards from participating in and contributing toward the utilization of range-betterment funds. Indeed, prioritization, as formulated in the DEIS, makes the allocation of range betterment funds a fait accompli, irrespective of grazing advisory board recommendations. We do not believe the intention of Congress was to create acquiescent grazing advisory boards whose only function would be to endorse or compliantly ratify USFS decisions.

The issue of grazing advisory board participation in the prioritization of range improvement funding is an ethical and legal matter. The determination of benefit/cost ratios for range improvements is a technical issue. We seriously doubt the ability of the USFS to accurately project AUM benefits resulting from the implementation of specific range improvements. We base this contention on: 1) the failure of the USFS to conclusively establish current biological carrying capacity on Gila National Forest allotments; 2) the indiscriminate and interchangeable use of biological carrying capacity and administrative carrying capacity in the DEIS and PNFP documents, and 3) the inherent difficulty of estimating in advance the casual response of biological carrying capacity to range manipulation.

Despite the preceding concerns, we do not mean to imply that AUM increases on targeted allotments cannot or will not occur. We have every reason to hope they do materialize. However, the significance of realized AUM increases must be predicated on the extension of biological carrying capacity potential, not administrative carrying capacity limits. If range improvements result in increased stocking rates that do not exceed the prior biological capability of the allotment, the net benefit of the range investment will be zero. This could occur if stocking rate decisions are made administratively as opposed to biologically (Section II B, NMDA Comments). Truly effective and beneficial expansion of livestock AUMs can occur only if resultant stocking rates exceed prior biological carrying capacity. In view of our earlier comments on biological and administrative carrying capacity, we must express our reservation concerning the evaluation of range improvement benefits presented in the Gila National Forest DEIS and PNFP.

H. Forest Output Benefits, Values, and Associated Costs

The values attributed to various forest outputs in the DEIS and PNFP are critical to the extent that they partially determine the allocation of scarce resources in the Gila National Forest. The benefit value attached to an AUM by the USFS, for instance, is sufficiently low relative to other critical forest outputs in the DEIS and PNFP (such as timber and wildlife) that model constraints are required to achieve desired levels of forage allocation for livestock. Without these constraints, resource allocations for livestock AUMs would be severely reduced, given the planning criteria incorporated in the Forest Planning Model. Accordingly, the following comments represent our evaluation and assessment of the benefit values assigned by the USFS to the major forest outputs.

Based on range benefit values and projected livestock numbers for the five decades of the proposed alternative's planning period, the value of an AUM ranges from approximately \$7.86 in period one to \$8.95 in period five (p. 49, DEIS). The value of \$7.86 for a current federal

Range betterment funds are allocated for improving deteriorated range lands. The priority for expenditure of these funds depends on several factors, one of which is the cost benefit ratio, another is the social and environmental considerations. The district ranger in cooperation with the permittee, jointly consider management needs identified in the allotment management plan. Range improvements for the respective allotments are then planned to correct resource problems. Based on the quantity of funds available, proposed projects have been presented for review by the advisory board. Advisory boards are not currently chartered, however, recommendations by the advisory board or any other concerned individual would then be evaluated by the Forest Service and the funds allocated. This process has worked very well on the Forest. We do not agree that the Forest Plan will limit the advisory board from making recommendation on the use of range betterment funds.

In your comment you also had a concern with the general description of Alternative A (current) (DRIS, page 20). Funding levels under current management and low grazing fees are not adequate to maintain all improvements. If we fail to maintain those improvements supporting the greatest number, the returns to the Forest Service in the form of range betterment funds will be progressively less. That is why priority for funding is for those yielding the greatest return. However, that doesn't preclude the advisory board from recommending the funds be spent to solve other problems.

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In your comment you disagreed with the grazing benefit values used by the Forest. The benefit values used by the Gila are based upon USDA Economic Research Service production models using actual permittee data from the Gila National Forest. Both fee and nonfee cash costs are used to arrive at the benefit value estimates using cost and production data specific to the Gila. We do not believe the benefit values are overstated or understated. While it is true that the actual fees charged are lower than the benefit values used, the fees are set by Congressional action, not by the Forest Service.

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AUM is overstated, in our opinion, if that amount reflects only the net marginal contribution of an AUM (fair market value of the forage equivalent of an AUM minus associated permit value and nonfee costs) to the income received by a permittee from leased federal lands. However, if permit value and nonfee costs are included in the benefit value of an AUM (e.g., see Allotment Management Plan for the Upper Green River, Pinedale Ranger District, Bridger-Teton National Forest, Region 4), it is highly probable that \$7.86 significantly understates the value of a federal AUM.

Nonquantifiable values, that are deemphasized or excluded in the DEIS and PNFP documents, can also be attributed to an AUM. Some of the derivative multiple-use benefits normally associated with timber activities, for instance, are generated by livestock operations. In particular, populations of certain wildlife species are able to enter new areas or to expand existing numbers within areas because of the presence of developed livestock water sources. The cultural value associated with a rural ranching lifestyle is also nonquantifiable. Yet, these contributions to the value of an AUM are largely omitted in the DEIS and PNFP documents. This omission contrasts sharply with the repeated emphasis in the DEIS and PNFP on the importance of various nonquantifiable values attached to wildlife and wilderness.

Nevertheless, the dollar values attributed to wildlife and wilderness in the DEIS and PNFP do exceed the value assigned to an AUM (p. 49, DEIS). However, conflicts between wilderness outputs and livestock grazing are minimal in the Gila National Forest PNFP. The primary conflicts identified by the USFS are between wildlife and livestock and, to a lesser extent, timber and livestock. Benefit values for timber, for example, consistently exceed those ascribed to livestock AUMs in all five decades of the proposed alternative's planning period (p. 49, DEIS). Like wildlife, timber is favored over AUMs in the Forest Planning Model. Not surprisingly, timber (sawtimber and fuelwood) and wildlife outputs are scheduled in the PNFP to increase by approximately 39 percent and 34 percent, respectively, over current levels by the fifth period (measured in HEP [p. 30, 44, 73, DEIS] and RVDs [p. 45 and 70, DEIS]). In contrast, AUMs are projected to decrease by approximately 10 percent below current use by the fifth period.

Accordingly, benefit values (quantifiable and nonquantifiable) are major factors in the determination of the absolute increases in timber and wildlife and the absolute decline in livestock AUMs. Although there is reason to believe the AUM benefit value used in the DEIS and PNFP is understated, it is doubtful, in our opinion, that its upward revision would significantly alter resource allocations in the planning model or impact final forest outputs. However, we do believe certain costs that are not included in the forest planning model for timber and wildlife, in conjunction with undervalued AUM values, could effectively alter resource allocation and forest outputs on the Gila National Forest.

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Net benefit values for timber, for instance, do not account for the cost incurred by the USFS in developing access roads for logging. Approximately 1500 miles of new roads, most of which are intended for logging, are planned for construction by the end of period five under the proposed action (p 117, DEIS). This represents a higher level of road construction than projected for all other alternatives. We believe these costs (p 48, DEIS) should be included in the formulation of net benefit values for timber. We realize many of these logging roads do have other multiple-use values or potentials. However, many, if not most, of these roads will be closed to the public (p 117, DEIS).

Additionally, we request information on the cost of timber sales to the USFS. Do these sales provide net income or do they result in net financial losses? Again, we recognize the mitigating factor of associated multiple-use benefits arising from timber harvests. However, we feel these costs must be considered in the derivation of an accurate net benefit value for timber. Similarly, we believe the USFS has not taken adequate account of the costs of environmental perturbations resulting from logging and allied road construction activities proposed in the DEIS and PNFP. Although accelerated soil erosion (see Section II D, NMDA Comments) and increased levels of riparian degradation (see Section II N, NMDA Comments) are nonquantifiable in dollar amounts, they do represent costs that should be considered in the assessment of net timber benefit values and in their comparison to other forest output values, such as AUMs and Wildlife Recreation Visitor Days (RVDS).

Significant costs are also associated with the benefit values attached to wildlife. Like timber, these costs have not been included in the formulation or assessment of net wildlife benefits on the Gila National Forest. Indeed, the DEIS and PNFP documents provide no reference to these costs, despite their potential environmental impact. Nevertheless, they do exist, and are attributable to the discrepancy between the high dollar amount assigned to wildlife RVDS by the USFS and the actual dollar amount collected by the USFS for their consumption by the general public.

The dollar value of a basic unit of wildlife, the RVD, ranges from approximately \$21.60 in period one to over \$26.60 in period five under the proposed alternative (p 49, DEIS). This amount exceeds the values for all other forest outputs. Yet, unlike other outputs on the Gila National Forest, the USFS receives no income from the sale of wildlife nor does it significantly control the harvest of wildlife (particularly game species). Income that is generated from wildlife accrues to the State of New Mexico. The consumer of wildlife RVDS on the Gila National Forest receives a highly priced commodity for a minimal to nonexistent investment.

The subsidy granted to wildlife consumers has resulted in an excessively high demand for inexpensive wildlife commodities (consumptive and nonconsumptive). Several environmental impacts are related to the market disequilibrium generated by this subsidy. First, the failure of the USFS to adequately charge for wildlife benefits (as well as other recreational outputs) has contributed to the magnitude of the conflict now existing between recreation and other forest uses. In particular, conflicts between wildlife and livestock have been aggravated by the USFS decision to increase wildlife outputs and decrease livestock AUMs in response to an extremely high wildlife benefit value. The USFS has done this despite the subsidies involved. Secondly, the subsidy provided by the USFS to recreation users of the Gila National Forest will potentially, in our opinion, encourage the over-utilization of recreation resources and result in probable environmental degradation.

There are additional ramifications associated with the subsidization of wildlife and other recreational uses. Specifically, the subsidy granted to the relatively few users who are willing or able to consume these forest products represents foregone income for the vast majority of people who are not active users of the Gila National Forest. Yet, the transfer payments occurring from nonusers to users of forest recreational commodities are ignored in the analysis of output values and benefits in the DEIS and PNFP. Additionally, the investments

You suggest that timber benefit values do not take into account the cost of roads associated with timber harvest. This is an incorrect assumption. Timber benefit values are based upon historical high bids for stumpage plus an allowance for purchaser credit roads. All road costs are included in the analysis and these costs are deducted from the benefits to arrive at net benefit values for timber. As a result of public comments on the Draft Plan, significant revisions have been made to Proposed Action timber program in the Final Plan. One of the most significant changes is the acreage proposed for timber production. In the revised Plan, only 272,000 acres (8 percent of the Forest) are proposed for timber management compared to 432,000 acres originally. About 97 percent of the presently unroaded acreage (excluding designated Wilderness) will be maintained in its present unroaded status during the life of the Plan. As a result, roading needs have been drastically reduced. A detailed explanation of these and other changes is shown in the Proposed Action Changes Summary at the beginning of this document.

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We agree that recreation and wildlife users on the Forest are receiving a "subsidy". However, it should be recognized that virtually all of the use and enjoyment derived from the Gila National Forest could be considered to be "subsidized." For this reason, we do not believe it is appropriate to single out any Forest users as being the recipients of an unfair federal subsidy. It is important for everyone, and especially those of us in the public sector, to freely acknowledge that income transfers or subsidies in one form or another are provided to practically all citizens. The determination of whether or not any transfer payment is "unfair" is the sole province of the U.S. Congress, not the Forest Service.

It is apparent that you feel that the wildlife dollar benefit values should not have been used in the Gila analysis. We believe it is important to recognize that all unit values, and especially future values, are only approximations of the output's worth and that these approximations were developed to assist in placing relative priorities along with numerous other criteria. The Forest used these benefit values and many other non-priced criteria, such as those you suggested, to prepare the Plan. This use of dollar and non-monetary benefit values for wildlife is consistent with established Forest Service policy. The wildlife benefit values were not changed in the revised plan; however, numerous changes were made in the wildlife analysis based on public comments.

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projected in the proposed alternative by the USFS to enhance recreation in the Gila National Forest (in conjunction with existing subsidies) have indirect costs not mentioned in the DEIS and PNFP documents. Demographic changes in New Mexico brought about by the allurements of accessible wildlife and other recreational opportunities will generate costs associated with increased pressure on scarce resources (water, in particular) and accelerated changes in culture and lifestyles.

The costs mentioned above are not amenable to quantification (in dollars) in all instances. However, that is not an appropriate reason for their exclusion in the DEIS process, in our opinion. Yet, even their inclusion would not overcome or compensate for the primary flaw of the USFS's wildlife benefit value: its fundamental subjectivity. We believe it is impossible to ascribe a fixed value to a commodity whose evaluation is subject to individual preference and not to the forces of supply and demand on the open market place. We do not contend that the value assigned by the USFS to wildlife is too low or too high. We contend only that it is inappropriate.

The inappropriateness of the wildlife benefit value is apparent in its inconsistent application in the allocation of forest resources and the determination of forest outputs. On one hand, the high value assigned to wildlife in the DEIS is a major cause for reduced livestock AUMs. On the other hand, constraints are added in the forest planning model that result in timber outputs experiencing a greater percentage increase than wildlife RVDs despite the significantly higher benefit value of the latter forest output.

The inconsistent use of the wildlife benefit value in the allocation of forest resources and the determination of final outputs suggests the USFS has not given equal consideration to the several multiple-use products obtainable from the Gila National Forest. Indeed, there appear to be definite biases in the DEIS and PNFP documents (and particularly the proposed alternative) favoring the production of timber (sawtimber and fuelwood) and, to a lesser extent, the production of wildlife RVDs. These biases, in our opinion, are partially the product of the USFS's failure to adequately account for forest output costs in the development and application of net benefit values in the forest planning process. These costs should be considered for all forest outputs, including AUMs. Unless these costs are taken into account, the projected allocation of forest resources and final determination of outputs in the proposed alternative will be arbitrary and not supportable, in our opinion.

We also recommend the USFS avoid injection of bias in the allocation of forest resources and the determination of forest outputs in the Gila National Forest. The USFS has a clear mandate under the terms of the Multiple-Use Sustained Yield Act of 1960 to provide a variety of forest outputs at sustained levels of production. We believe therefore, that it is not suitable for the USFS to emphasize some forest outputs (timber primarily and wildlife secondarily) and to deemphasize others (AUMs). Accordingly, we urge the USFS to modify the DEIS and PNFP to ensure equal consideration for all forest outputs obtainable from the Gila National Forest.

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You apparently believe that the Gila analysis process is unfairly biased against grazing on the Forest. We believe the premise that permittees' income and livelihood are being unfairly sacrificed in order to increase the income transfers to recreationists is unrealistic. The overriding reason for any past or future reductions or realignments in permitted use is the ability of the land to produce forage on a sustained basis and at a level consistent with the multiple-use objectives of an area. No actions to reduce permitted use which will deny the permittees' rights to due process will ever be made on this or any other National Forest.

The repeated claim that the USFS is biased against livestock interests is not credible. Neither the documented historical record of the Forest nor the Proposed Action can support this allegation. We have clearly stated that from our perspective, permitted use exceeds capacity. We have clearly stated that it is our intention to increase capacity and at the same time, reduce permitted use so that by the end of the second decade, capacity and use will be balanced. We do not believe that these conclusions contribute any evidence of bias on our part. What you apparently interprets as "bias," appears to us to be a legitimate difference of opinion based upon our differing agency missions and perspectives.

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I Comparability of Livestock and Wildlife Values and Benefits

The pricing of forest outputs and the use of those prices in the forest planning model to allocate scarce resources infer equivalence or comparability between dollar units of different outputs. This assumption is valid for goods and services whose value is determined by market price. It is not valid for goods and services whose values are not or cannot be expressed in dollars. Livestock, for instance, is valued in the DEIS and PNFP according to the alleged, fair market price of an AUM. Similarly, wildlife is valued according to the estimated price of one wildlife recreation visitor day (WRVD). In both of these instances, however, the USFS has assigned dollar prices to commodities (livestock and wildlife) whose values are not readily amenable to quantification, in our opinion.

An AUM is defined as a unit of forage for livestock. However, in reality, it is also the economic foundation of a ranching unit which, in turn, is the material base for a particular lifestyle. The value of that lifestyle cannot be quantified in terms of dollars. A similar argument can be presented for wildlife. The WRVD reflects the recreation value, in dollars, of wildlife to hunters, hikers, and naturalists. Yet, the attempt to encapsulate wildlife value in nebulous terms of recreation is insufficient. The value of a species is simply not expressible in terms of dollars. A number of federal statutes protecting wildlife, such as the Threatened and Endangered Species Act, attest to this point. Their purpose is to prevent (by protection) the exhaustion of scarce biological resources which, because of their nonquantifiable value, are not amenable to allocation by the pricing mechanism of supply and demand.

Despite the intrinsic, nonquantifiable values of livestock ranching and of wildlife on the Gila National Forest, the USFS presents these two forest outputs (expressed as AUMs and WRVDs) as comparable commodities for the purpose of analysis in the DEIS and PNFP. This has created, in our opinion, a distortion in the resource allocation process and in the planning of forest activities.

As mentioned previously, all management alternatives (including current management) "provide habitat suitable for maintaining at least minimum viable wildlife populations" (p. 56, DEIS). Presumably, increases in wildlife populations resulting from habitat and forage reallocations, which are planned in the proposed alternative, would be in addition to existing minimum viable numbers. The surplus members of the wildlife species resulting from the reallocation of forage and habitat from livestock would necessarily have a lower, though indeterminate, value than the original "minimal" population.

The devaluation of these additions to targeted wildlife populations is the result of a decrease in the marginal worth of each new individual. Prior to population expansion, individuals comprising the minimum viable populations had a value equivalent to that of the species. Unlike the value attributed to the "surplus members" of the population, the value of these individuals would be higher (and possibly infinite). In contrast, population additions in excess of the minimum are superfluous to the survival of the species (though certainly not superfluous to the functioning of the ecosystem or to other species) and of lower, finite value. Accordingly, these surplus numbers of wildlife are more amenable to pricing (insofar as they have finite value) than the minimum viable populations.

The USFS in the DEIS and PNFP proposes to reduce livestock AUMs on the Gila National Forest to allow surplus accumulation, to some unknown level, of targeted wildlife species. The implied goal of generating additional wildlife numbers is to augment existing recreational opportunities. Neither the DEIS or PNFP put forward commanding ecological justifications for expanding wildlife populations beyond current wildlife habitat and forage potentials. Additional WRVDs, resulting from assumed wildlife population increases, are only intended, to the best of our knowledge, to meet projected increases in recreational demand (p. 70, DEIS). Yet, these WRVDs are treated by the USFS as dollar equivalents of AUMs in the DEIS and PNFP documents.

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We agree with your position that it is difficult to assign dollar benefit values to many resources. However, as noted earlier, one should recognize that all unit values, and especially future values, are only approximations of the output's worth. These approximations were developed to assist in placing relative priorities, along with numerous other criteria. The use of assigned dollar benefit values for livestock and wildlife follows nationally established Forest Service procedures.

In addition, your comment indicates that you believe that grazing reductions are being planned on the Gila in order to increase wildlife populations. You portray this situation as one of cattle versus wildlife and imply that most wildlife increases will require reductions in grazing permitted use. You repeatedly state that permittees' livelihoods are to be sacrificed in order to increase wildlife numbers. This is an incorrect interpretation of the intent and substance of the Proposed Action. Simply stated, the Forest Service position is that some areas of the Forest are over-grazed by domestic animals. In other words, the carrying capacity of the land has been exceeded and resource damage has occurred. We propose to remedy this situation by increasing the carrying capacity and lowering permitted use. This will be done over a 15-20 year period so that potential effects on permittees will be minimized. The Forest Service proposals are premised upon the conclusion that grazing use exceeds grazing capacity and therefore some action must be taken. We believe there is ample evidence to support this premise. Apparently you do not agree with the Forest Service view that use exceed capacity. No compelling evidence has been offered to dispute the Forest Service position.

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The AUM cannot be construed as the dollar equivalent of a "surplus" WRVD in our opinion. We believe scientifically indefensible allotment AUM reductions proposed in the USFS preferred alternative would unnecessarily affect the future viability of many of the targeted ranching units in the Gila National Forest. Many of the public land ranches on the forest are currently experiencing severe financial distress. AUM reductions on the scope envisioned by the USFS in the DEIS and PNFP documents could easily force economically marginal permittees out of business as their allowed numbers of livestock are reduced below the "minimum viable population" necessary for the survival of the ranching unit.

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We believe the ecology and survival of Gila National Forest ranching units are no less important or inherently valuable than the ecology and survival of the wildlife species inhabiting the same forest. Each has an intrinsic value incomparable to the other. Each has an appropriate niche in the larger ecosystem of the forest. Consequently, we cannot accept the economic or social rationalizations inferred in the DEIS and PNFP for the reduction of livestock numbers. Neither the maximization of Present Net Value (PNV) or Net Public Benefits (NPB) are sufficient justifications in our opinion (pp. 124-125, DEIS).

Simply stated, we do not believe the USFS can legitimately use comparisons of AUM dollars and WRVD dollars created by forage reallocations to make decisions concerning resource allocation in the Gila National Forest. A dollar arising from such a unit of recreation is not equivalent to a dollar generated by a unit of livestock. One adds to existing recreational opportunities. The other maintains an existing source of livelihood. Indeed, to the extent that recreational dollars are created by the elimination of livestock dollars, higher values are diminished and significant subsidies and associated transfer costs are generated. The infinite value of the marginal AUM (from the perspective of the survival of the ranch unit and its social and cultural extensions) that forces a permittee out of business when lost becomes, by transformation, the finite, and necessarily lesser, value of the resultant surplus wildlife population and its associated recreational uses. The lost AUM dollar is not replaced by an equivalent WRVD dollar, in our opinion.

Additionally, the right of a species, whether human or not, to exist and to thrive within its own environment and by its own means has been repeatedly confirmed in word and spirit in the fundamental federal documents and the derivative laws of our nation. We are concerned the Gila National Forest DEIS and PNFP documents have, by implication, considered recreational "privileges" on the same level of analysis as the fundamental rights asserted above. In so doing, the USFS is sacrificing the ecological integrity and possible survivability of life-systems dependent on the Gila National Forest in exchange for peripheral values such as the aggrandizement of regional or national recreation.

We are alarmed by these implications which are evident in the Gila National Forest DEIS and PNFP documents. We urge the USFS to reconsider their actions as presently proposed and to modify them accordingly. The decision as to whether the Gila National Forest remains a functioning community whose purpose is the common survival of resident people and wildlife or is transformed primarily into a recreational experience for nonmembers of the forest community must be addressed by the USFS. However, the final decision, in our opinion, has already been made by the Congress of the United States. The Multiple-Use Sustained Yield Act of 1960 is clear in its intent. A viable livestock industry, along with other multiple forest uses, must be permitted to continue.

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NMDA-38

You state in your comment that the Gila Forest Plan is "sacrificing the ecological integrity and possible survivability of life-systems dependent on the Gila National Forest in exchange for peripheral values such as the aggrandizement of regional or national recreation. . . . The decision as to whether the Gila National Forest remains a functioning community whose purpose is the common survival of resident people and wildlife or is transformed primarily into a recreational experience for nonmembers of the forest community must be addressed by the USFS." You apparently feel that some users of the Forest resources (permittees) will be discriminated against in favor of some "nonmembers of the forest community" (recreationists). We do not agree with this assessment. The USFS is mandated to manage the public trust lands for all of the people, not just "members of the forest community". In doing so, the Forest Service must consider the needs of local users such as permittees as well as recreationists and hunters and fishermen from across the country. In our judgement, this is neither unfair nor unrealistic. We believe the Proposed Action represents a "balanced" view of forest management given the numerous demands on Forest resources.

LETTER NMDA

J. Reduction of Livestock AUMs for Forage Reallocation and Improvement of Wildlife Habitat

The USFS proposes a major reallocation of forage from livestock to targeted wildlife populations, particularly big game species, and a subsequent program of wildlife habitat improvement in the Gila National Forest PNFP (p 19, DEIS and p 7, PNFP). The forage reallocation and habitat improvement activities projected by the USFS in the PNFP are based on two premises, 1) livestock and wildlife conflicts currently exist and, in some areas of the forest, have reached critical levels (pp 34-35, DEIS), and 2) future growth of targeted wildlife populations requires additional allocation of forage and improvement of habitat (p 10, DEIS Summary).

The validity of the first premise is predicated on the existence of reliable information concerning the extent of forage overlap and competition for habitat between livestock and specific big game species (addressed in Section II K, NMDA Comments), the numbers of livestock currently grazing forest ranges, total available AUMs on the Gila National Forest, and population sizes of targeted wildlife species. We are reasonably certain the USFS does have an accurate count of the numbers of livestock now grazing forest lands. However, we do not have the same confidence in USFS estimates of current forest biological carrying capacity for wildlife and livestock or population counts of targeted species that presently exist within the forest. The estimates of allotment and forest-wide carrying capacities provided by the USFS are not acceptable as presented in the DEIS and PNFP. In our opinion, they lack conceptual clarity (i.e., administrative versus biological capacity) and adequate scientific documentation (see Section II B, NMDA Comments). Moreover, these estimates reflect only livestock AUMs that were measured on the 2.3 million acres of suitable rangeland in the Gila National Forest (p 102, DEIS). The forage potential of an additional 1 million acres unsuitable for livestock grazing is omitted in the calculation of these AUMs despite their suitability "for grazing and browsing by wildlife" (p 102, DEIS). We would like to know if the USFS has additional vegetational data, recently collected and statistically sound, that might indicate the numbers of wildlife AUMs (WAUMs) attributable to this area? If yes, what are the numbers? Also, we are unable to determine from either the DEIS or PNFP whether the AUMs calculated for the 2.3 million acres of suitable rangeland include forage potential specific to wildlife. In view of these data deficiencies, we cannot support USFS estimates of wildlife and livestock carrying capacity on the Gila National Forest without further documentation.

The validity of USFS population estimates of targeted big game species is also questionable. These estimates are based on a 1980 inventory (p 69, DEIS) which, in our opinion, has a low statistical confidence. Moreover, the relevance of population counts made over five years ago to current forest conditions and forest needs is doubtful. In the absence of defensible and relevant big game population counts, as well as reliable estimates of livestock and wildlife carrying capacity, we believe the USFS cannot adequately substantiate its allegation concerning the existence and/or extent of wildlife-livestock conflicts.

We find it equally difficult to accept the USFS premise that future growth of targeted wildlife populations can be achieved through additional allocation of forage and improvement of habitat. Lacking management authority and control over resident big game species, we do not see how the USFS can expect to accomplish this goal. Moreover, the soundness of this premise is postulated on three assumptions, 1) current wildlife habitat is filled and existing forage fully utilized, 2) reallocated forage and improved habitat is ecologically and physically accessible to wildlife, and 3) reallocated forage and improved habitat has a high probability of being used by wildlife. We believe these assumptions are not adequately addressed by the USFS in the DEIS and PNFP documents.

FOREST SERVICE RESPONSE TO LETTER NMDA

NMDA-39

The determination of forage available for livestock and wildlife is accomplished jointly during the range environmental analysis process. The quantity of livestock using a given area becomes a known based on permitted numbers. The quantity of wildlife is estimated based on input from permittees, the New Mexico Game and Fish Department, and the Forest biologist. The combination of both livestock and wildlife numbers on a given area sets the current use.

Your concern with the validity of wildlife populations is shared by the Forest Service. In order to improve the estimates between the draft and final plan, additional data was gathered from Forest permittees, Forest Service employees and the New Mexico Department of Game and Fish. We do not know of a more reliable method to gather information. To NMDGF population estimates are validated annually using aircraft and ground checks. The information in the Plan represents the best knowledge on wildlife numbers we have to date. The question of how reliable these estimates are can go on forever, however we must remember they are only estimates used to project future outputs. If the wildlife output projections used in the Plan cannot be reached due to other limiting factors as you suggest, the forage will be reallocated as shown on the standard and guidelines.

Your recommendation to postpone decisions on livestock AUM reductions and subsequent wildlife habitat improvements until requisite information is available is not acceptable. The actual adjustment in livestock numbers or the development of wildlife habitat will be based on project plans using current data and following the environmental analysis process. The Forest Plan projections will not be used to determine livestock adjustments. Actual updated range environmental analysis data will be used to help make this decision.

NMDA-40

The Forest Service maintains the forest habitat required for the existence of all wildlife species. The regulatory authority to control all wildlife numbers is with the NMDGF. As you can see, without the habitat, wildlife population will decline. This very close relationship between habitat and numbers creates the necessity for joint USFS and NMDGF cooperation. Your concern that the USFS lacks authority to manage and control big game species, and thus cannot accomplish its goals is unfounded. Through a cooperative effort by all interested parties, most problems will be resolved in an equitable manner.

LETTER NMDA

FOREST SERVICE RESPONSE TO LETTER NMDA

NMDA-41

Response under comment # 38

The validity of the first assumption should be established by the USFS prior to the implementation of forage reallocation and habitat improvement projects. Livestock AUM reductions and subsequent expenditures on wildlife habitat improvement will have minimal effects on wildlife numbers if current populations on the Gila National Forest are insufficient to utilize existing carrying capacity due to some limiting factor other than habitat (i.e., disease, predation, human impact, etc.). Under these circumstances, a more appropriate management strategy might involve the amelioration of limiting factors to achieve population expansion within existing habitat parameters.

Furthermore, the USFS should also estimate the accessibility of reallocated forage and improved habitat to targeted wildlife and the probability of its utilization to correctly assess the likelihood of population expansion of big game species. Abundant forage and habitat does not necessarily imply that big game wildlife populations will automatically expand. Physical location and ecological characteristics of habitat, including composition and palatability of associated forage, are major considerations in the assessment of the suitability of new habitat for specific wildlife species. Additionally, other factors, such as predators, available water and plant cover suitability may effect the ability of targeted wildlife species to fully utilize the biotic potential of reallocated forage and improved habitat.

Lacking adequate validation of these assumptions and full consideration of other pertinent factors in the DEIS and FNEP documents, we have no basis on which to judge the USFS projection of future wildlife responses to reallocated forage and wildlife improvement. These responses are indeterminate in view of the paucity of information provided by the USFS in their analysis of wildlife. Therefore, we recommend the USFS postpone decisions on livestock AUM reductions and subsequent wildlife habitat improvements until requisite information is available. This course of action will avoid undue hardships to livestock permittees on the Gila National Forest and will ensure the efficacy of future USFS programs to maintain or increase targeted wildlife populations.

K. Alternative Perspectives on Alleged Livestock and Wildlife Conflicts

In our opinion, the USFS has provided inadequate analysis in the DEIS and FNEP of the cause, extent, and solution of alleged wildlife-livestock conflicts on the Gila National Forest. The existence and extensiveness of these conflicts have already been partially addressed in Section II I of these comments. We have not, however, commented on species-specific factors that can impact the magnitude of wildlife-livestock conflicts. The DEIS, for instance, mentions that "Levels of livestock use affect amounts of forage available for wildlife" (p. 47). We must point out, however, that the degree of conflict is also dependent on the wildlife species involved.

There is a greater probability of forage-use overlap between cattle and elk, for instance, than between cattle and deer. Therefore, a greater degree of conflict can be expected between the former. Surprisingly, however, the New Mexico Department of Game and Fish (NMDGF) reports the elk population on the Gila National Forest has been increasing in recent years (personal communication, 1985, and NMDGF Performance Report). This suggests the wildlife-livestock conflicts postulated by the USFS in the DEIS and FNEP may not be as extensive as reported. If this is the case, the USFS should refrain from making unnecessary AUM reductions on allotments within the Gila National Forest.

* Bell, Mike 1984 Big Game Research-Elk Research Performance Report. W-124-R-7, WP1, Job 2 12 pp

LETTER NMDA

FOREST SERVICE RESPONSE TO LETTER NMDA

The extent of wildlife-livestock conflicts should also be interpreted in the context of the recent grazing history of the Gila National Forest. Some past livestock management activities, for instance, have contributed indirectly to the improvement of wildlife habitat (p 98, DEIS). This has occurred most dramatically from water development, although seeding and brush control have also been significant factors in amelioration of habitat for wildlife uses. The significance of range improvements to wildlife habitat is evident on allotments scheduled for AUM reductions. The management area plan for the Rough Canyon, Mogollon Creek, Watson Mountain, Brock Canyon, Span Canyon, and Red Stone allotments provides for the continuation of range improvements "necessary for wildlife" (p 235, PNFP). The benefits to wildlife habitat that have evidently resulted from range improvements mollify, in our opinion, the severity of USFS alleged wildlife-livestock conflicts. Indeed, range improvements may, under appropriate circumstances, allow wildlife populations to exceed levels that would otherwise not occur in the absence of such activities. Although this is not universally true, we do believe the USFS has been remiss in emphasizing the negative impacts of livestock grazing on wildlife and de-emphasizing the beneficial effects in the DEIS and PNFP documents. We are also concerned that permittees, whose land management activities have resulted in increased wildlife populations, may be penalized by reductions in permitted AUMs for possible future conflicts emerging between augmented big game populations and static livestock numbers.

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Accordingly, we recommend the USFS reevaluate existing and projected levels of wildlife populations in view of contributions to wildlife habitat arising from livestock management activities. Furthermore, we urge the USFS to actively pursue or to encourage permittee development of range improvement practices that will alleviate the need to reduce permitted AUMs and, at the same time, will prove beneficial to wildlife habitat. Additionally, we oppose any attempt by the USFS to reduce permitted livestock numbers on allotments where the extent of wildlife-livestock conflicts are unknown, or unstantiated, or where the activities of past range management have resulted in wildlife populations exceeding natural site potential.

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The preceding recommendations and comments refer only to the reevaluation of alleged wildlife-livestock conflicts in the context of their plausible existence and extensiveness. We have noted, however, that the DEIS and PNFP documents omit reference to a major source of wildlife-livestock conflicts in the Gila National Forest. Specifically, past fire management practices of the USFS may have resulted in degradation of wildlife habitat on the Gila National Forest, especially in wilderness areas. Wildlife forage and habitat in some wilderness areas have been detrimentally affected by "reduced fire occurrence [which] has interrupted the natural maintenance and creation of early successional stages" (p 99, DEIS).

The consequent reduction of adequate wildlife forage and habitat in these wilderness areas has created, in our opinion, the necessity (or the perception of necessity) to shift forage and habitat resources away from livestock and to targeted big game species. Whether this reflects a genuine increase in pressure from wildlife species for additional forage and habitat, we cannot ascertain from information provided in the DEIS and PNFP. However, we strongly believe AUM reductions should not be made in order to compensate for past fire management decisions that have apparently resulted in deteriorated wildlife habitat. Indeed, we recommend that the USFS maintain permitted livestock numbers at current levels forest-wide pending the results of a monitoring program similar to that which we have proposed in Section II A of those comments. Additional forage and habitat for wildlife should be provided, in part, through an aggressive program of prescribed burning. Once excessive surface fuels are reduced to acceptable levels, the USFS should rely on natural fire occurrence to maintain suitable levels of wildlife habitat and forage in wilderness areas.

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NMDA-42

Livestock and wildlife occupy similar habitat or vegetative types in the forest ecosystem. The presence of livestock may create a positive niche for some species and a negative niche for others. Understanding 1) the complexity between species of wildlife and livestock and 2) the degree of overlap for forage, is necessary in determining Forest allocations. Regardless of why forage improvements occur or fail to occur, adjustments must be made between competing uses if a sustained quantity of forage is to be maintained. The allocation levels provided in the Forest Plan for wildlife and livestock represents our projected level of output to best balance use.

NMDA-43

We share your concern for the maintenance of high levels of outputs for all resources and for not making reductions in livestock numbers where a conflict with wildlife is unsupported. For this reason, we have added a statement in the Forestwide Standards and Guidelines that "If forage allocated to wildlife is not the limiting factor in meeting the level of wildlife emphasis, that temporary forage can be used by livestock. If wildlife numbers increase and forage becomes a limiting factor in meeting the level of wildlife emphasis, the temporary livestock use will be withdrawn".

NMDA-44

Grazing in and out of the wilderness is an approved practice. There has never been an attempt to decrease stocking rates within wilderness or to adjacent nonwilderness allotments, simply because they are classified wilderness. Procedures used to evaluate livestock impacts remain the same inside or outside the wilderness area. Stocking rates prior to wilderness classification, when compared to those of today, are relatively the same. Actual data as requested on the annual months of grazing prior to wilderness and current stocking rates has been forwarded to you.

LETTER NMDA

We do not mean to suggest by these comments that prescribed burning alone, or in conjunction with existing or new range improvements, will eliminate wildlife-livestock conflicts completely, if indeed conflicts exist. However, we do believe these actions in combination with other available technologies (Technologies to Benefit Agriculture and Wildlife, Office of Technology Assessment, 1985) can effectively resolve perceived or existing conflicts to the satisfaction of all users of the Gila National Forest. In our opinion, the DEIS alternatives and the PNFP should be reformulated to include such strategies. They offer the potential to USFS managers to maintain livestock numbers at current levels and, at the same time, to provide for the needs of wildlife and recreation.

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Evidence of this potential can be seen in the partial resolution of wildlife-livestock conflicts that occurs in Alternative E of the DEIS. Not only do projected livestock numbers remain virtually unchanged from current permitted levels under this alternative, but wildlife habitat is maintained at a significantly higher level than it would be under the PNFP (p 32 and 45, DEIS). This alternative demonstrates that wildlife and livestock can coexist within the boundaries of the Gila National Forest. It also suggests that the basic resource conflict requiring AUM reductions in the PNFP has resulted not from wildlife pressures but from the timber management programs and policies of the USFS that have relegated both wildlife and livestock grazing to secondary status in the prioritization of forest outputs.

We cannot, however, support Alternative E. Procedural, methodical, and technical problems previously noted apply equally to this alternative. In addition, neither this alternative or others included in the DEIS adequately address the impact of increased big game populations on adjacent, nonforest lands. Also, the alternatives and plans of the DEIS and PNFP do not provide for adequate monitoring or control of wildlife populations on the Gila National Forest. The responsibility and authority for monitoring and controlling big game species populations resides with the NMDF. Unless the USFS can coordinate their activities with NMDF and reach consensus with that agency on wildlife goals, it is unlikely the wildlife projections of the PNFP can be realized. Provisions to that effect are conspicuously absent in the DEIS and PNFP documents.

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L. Animal Damage Control

No where in the DEIS or PNFP documents do we find mention of predator or rodent control as methods of enhancing or protecting livestock production or achieving range management goals. There are times and circumstances when rodent control may be necessary to protect an investment in range management, such as prairie dog invasion of a seeding project following brush control. Also, control of predators that maim or kill livestock (i.e., calf predation by coyotes) is a serious problem in some areas and has been documented on the Gila National Forest.

We are concerned that if Animal Damage Control (ADC) is not identified in the PNFP, it will be precluded in the future once the final plan is approved. We urge the USFS to include ADC provisions in a revised DEIS and PNFP. The USFS is already involved in these activities as a signatory party to the New Mexico Interagency ADC Guidelines. Procedures for authorizing ADC are also contained in the USFS manual under Title 2600. We feel it would be appropriate to acknowledge these guidelines and procedures in the DEIS and PNFP documents. In addition, recognition should be given to the roles played by the U.S. Fish and Wildlife Service, New Mexico Department of Agriculture, and the New Mexico Department of Game and Fish in conducting animal damage control activities on forest lands.

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FOREST SERVICE RESPONSE TO LETTER NMDA

NMDA-45

Wildlife improvements are scheduled in conjunction with range improvements and include prescribed burning as a management practice. We agree that prescribed burning alone, or in conjunction with existing or new range improvements, will not eliminate wildlife-livestock conflicts completely. They are however, included as a management strategy in the Plan. We feel the combination of available technologies will resolve to some degree, many of the existing and future conflicts.

NMDA-46

Wildlife and livestock can coexist on the Forest and can interrelate with timber and recreation. The concern is not can wildlife and livestock coexist, but at what cost. Management for multiple use with a constrained budget makes it imperative that we gain the greatest benefits for the least cost to meet the demanded needs of the public. In some cases the land lends itself to livestock management with very little cost and other areas become more expensive to operate and for less AUM's. If we are to minimize the impacts of the constrained budget and meet the multiple use demands of the public we must spend funds where they can create the greatest return. Wildlife populations projected in the proposed plan have been adjusted to account for their impact on private lands. This was done in coordination with the New Mexico Game and Fish. It is our goal to continue to work with all parties concerned to regulate the activities and the outputs of the National Forest to minimize the impacts to the public.

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There are circumstances where rodent control or predator control may be necessary to improve range or protect an investment in range management. Animal damage control was not specifically identified in the Forest Plan because it is an operational program carried out as needed, in a manner consistent with existing laws and regulations. However, a Forestwide Standard and Guideline will be added to the Forest Plan stating "Animal damage control activities will be allowed on the Gila National Forest in accordance with the Interagency ADC Guidelines and the annual Forest ADC plans developed pursuant to U.S. Forest Service manual 2600".

NMDA-47

Economic impacts and social conditions were evaluated for the three counties affected by the Plan using IMPLAN. We feel our analysis is adequate at this level. The overall economic impact on the three counties is negligible as stated in the DEIS, pp.128-129. We agree that the effects on individual segments of the economy such as grazing, was not addressed in the DEIS; however, some additional discussion of these effects has been added to the Environmental Impact Statement. This discussion does not satisfy NMDA's demand that effects on allotments targeted for reductions be discussed individually. Because each permittee has a unique economic situation, it would be nearly impossible to incorporate all the potential variables in an economic impact analysis for each permittee [see response number 30]. Individual economic and social impacts are discussed as part of the environmental analysis performed as part of allotment management planning process.

LETTER NMDA

FOREST SERVICE RESPONSE TO LETTER NMDA

M. Adequacy of DEIS Economic Impact Analysis

A substantial proportion of the preceding comments have focused directly or indirectly on the reduction of livestock numbers proposed by the USFS on allotments occurring within the Gila National Forest. Surprisingly, the USFS makes no mention of potential impacts resulting from AUM reductions in the DEIS analysis of environmental consequences. We have no doubt that AUM reductions of the magnitude proposed in the PNFF have the potential for creating economic, social and cultural hardships, and dislocations. Yet, other than a brief reference to localized "impairments" occurring "before grazing permitted numbers are balanced with forage capacity" (p. 45, DEIS Summary), the DEIS analysis infers only negligible impacts on employment and social conditions arising from implementation of the PNFF (pp 128-129, DEIS).

We perceive the impacts resulting from AUM reductions to be significant. If only one permittee is potentially affected in an adverse manner by the projected stocking adjustments, that impact should be included in the analysis of environmental consequences. Unfortunately, we feel that more than one permittee may be adversely impacted. Accordingly, we request that the USFS amend the analysis of environmental consequences in the DEIS to include a thorough analysis of potential economic, social, and cultural impacts that may result from implementation of AUM reductions on targeted allotments in the Gila National Forest. Unless this is accomplished, we cannot consider the DEIS as currently written to be in compliance with the requirements of NEPA.

N. Livestock Grazing and Riparian Areas

The USFS infers a high degree of incompatibility between livestock grazing and riparian management on the Gila National Forest. Riparian conflicts are described by the USFS as "livestock grazing versus recreation use versus wildlife habitat, and livestock grazing versus wildlife habitat" (p. 77, DEIS). Concentrations of livestock on riparian areas are viewed simply as "detrimental" (p. 97, DEIS). No mention is made by the USFS that the season and length of stay is critical. Indeed, high concentrations of livestock in riparian areas at appropriate seasons and for short durations may actually benefit riparian habitat for wildlife and recreation uses. Nevertheless, livestock grazing is portrayed in the DEIS as the common denominator in conflicts concerning riparian resources.

A review of alternative management impacts on riparian areas supports a different conclusion. Significantly, positive effects on riparian ecosystem health occur even under a management level (Alternative E) that results in maximum livestock output (p. 38, DEIS). In contrast, timber harvests adjacent to riparian zones that result in optimum outputs consistently entail negative impacts on the health of these ecosystems. The fate of riparian ecosystem health is similar under the management levels of the proposed alternative. Livestock management results in ameliorated riparian conditions whereas timber harvests adjacent to riparian zones result in degraded conditions. These results simply do not support the DEIS contention that "Plant and animal components of riparian ecosystems are primarily affected by levels of livestock use" (p. 123).

NMDA-48

The health of riparian areas are very important and can be related to all of man's activities, as well as mother nature's activities. The same can be said for activities in other vegetative types; however, riparian areas tend to concentrate all activities and uses into a very limited zone. We agree there is a need to reword the EIS and reflect your concern that not all concentrated livestock activities are necessarily harmful to the riparian zone. Corrections have been made in the range section of the DEIS.

NMDA-49

The wording in the DEIS suggesting that soil loss from livestock grazing currently has the greatest impact on sediment yield is misleading. Because livestock grazing takes place on more acres than other activities the total loss is greater. Timber harvest or road construction may have a greater impact on sediment yield per acre than grazing, but on fewer acres. The total sediment yield for the Forest is the accumulation of all activities. We have reworded the DEIS to reflect this quantity relationship. Data requested describing how this data was collected is documented in the Soils Outputs Technical Report. A copy has been forwarded to you.

O. Livestock Grazing and Forest Soil Erosion

The USFS presents statements and conclusions on forest soil erosion and sedimentation in the DEIS which are not substantiated by facts. Specifically, the DEIS identifies livestock grazing as having " the greatest impact on sediment yields" (p 39, DEIS Summary) it also concludes that "Persistence of soil loss will occur in some areas until livestock grazing is balanced with grazing capacity (p 59, DEIS) Allegedly, the principle resource conflict with livestock grazing, other than wildlife, is soil loss (p 31, DEIS) The essence of these claims is that grazing embodies the primary cause and the principle solution (through AUM reductions) to soil loss on the lands of the Gila National Forest The DEIS, however, fails to substantiate these statements and conclusions Accordingly, we request that the USFS provide documentation of soil losses attributable to livestock grazing

The DEIS does provide estimated average annual soil loss resulting from grazing, timber harvest, road construction, and road maintenance activities (p 111, DEIS) We would like to know how this data was collected and analyzed and the method used by the USFS to separate soil loss caused solely by livestock grazing Furthermore, how has the USFS accounted for natural soil erosion in these estimates? Is there a differential rate in natural soil loss between grazing lands and timber lands on the Gila National Forest? Soil and vegetation differences between the two, particularly on arid sites where grazing and timber activities do not overlap, suggest that such a differential rate does exist If it does, how has the USFS accounted for those different levels of natural sedimentation when comparing soil erosion resulting from livestock grazing to soil erosion from other sources?

For example, the DEIS categorically states that livestock grazing is the primary cause of the estimated annual soil loss of 5-6 tons per acre on the Gila National Forest (p 111, DEIS) We request that the USFS break this amount down to quantities of soil loss by all major categories of forest activities, including natural erosion We further ask that full documentation be provided with this breakdown and that the techniques and methods used in data collection and analysis be included

Furthermore, we request the USFS substantiate by appropriate documentation the assertion that " soil loss will occur in some areas [of the national forest] until livestock grazing is balanced with grazing capacity" (p 59, DEIS) Are we to interpret this statement to say that other forest activities will not generate sedimentation once grazing is balanced with forest carrying capacity? Also, which carrying capacity figures will the USFS use in reaching the goal of zero soil loss (if such a goal can even be met) those based on administrative or biological carrying capacity (Section II B, NMDA Comments)?

Additionally, how does range condition relate to the determination of soil loss? Are we to assume that livestock grazing balanced with carrying capacity on poor condition ranges will produce less sedimentation than livestock grazing not balanced with carrying capacity on excellent condition range? The DEIS would appear to support such a conclusion despite evidence to the contrary Finally, how does the universal soil loss equation, as used by the USFS in the formulation of the DEIS and PNFP, relate to determinations of soil loss based on the balance between livestock grazing and carrying capacity on one hand and the ecological condition of range sites on the other?

We have presented this extensive list of questions to the USFS for clarification and interpretation of other evidence that seems to suggest that livestock grazing is not the primary source of sedimentation on the Gila National Forest The Water Quality Protection Guidelines for Forestry Operations in New Mexico, issued in 1983 by the New Mexico Natural Resources Department, Forestry Division, has determined that " forest roads and trails were the most important pollution source [of soil loss], followed by timber harvesting" (p IV) on New Mexico watersheds We have interpreted this statement to mean timber harvesting and related logging road construction, and not livestock grazing, are the primary causes of soil erosion on New Mexico forestlands

NMDA-50

We disagree with your conclusion as supported by our comments listed above. The documents have been written to comply with the requirements of existing laws. They provide the frame work for multiple use of the Forest resources while providing the best mix of activities to meet the demands of the future and will not be withdrawn. The impacts to the livestock industry are a concern of the Forest Service, but they are not the only concern we have to address.

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LETTER NMDA

Data presented in the Gila National Forest DEIS corroborates the results of this study. Levels of estimated average annual soil loss are lowest for Alternatives E and F. Significantly, Alternative E maximizes livestock output. In contrast, the highest levels of estimated average annual soil loss occur in alternatives maximizing timber outputs (p 111, DEIS). Not surprisingly, the proposed alternative, which optimizes timber harvests and provides a level of livestock output significantly lower than Alternative E, is associated with the highest level of estimated average annual soil loss. Indeed, even the no action alternative has a lower level of soil loss (as well as a lower level of timber output) than the proposed alternative. Timber and associated road construction activities, not livestock grazing, appear to be the most conspicuous common denominators in the causal relationship between forest activities and soil erosion.

Conclusion and Summary

The comments that we have provided have focused on the single issue of livestock grazing on the Gila National Forest. Although we have touched on other subject areas in the preceding pages, we have consistently tried to limit our comments to the procedural and substantive issues of livestock grazing.

Our review of procedural issues has revealed a consistent failure by the USFS to comply with federal laws and regulations. Our review of substantive issues has revealed gross deficiencies in: 1) USFS data bases, 2) USFS use and application of key ecological concepts, 3) USFS measurement techniques and methodologies, 4) USFS approach to and interpretation of multiple-use, 5) USFS estimation of forest output benefits and values, and 6) USFS presentation of critical issues (riparian and soil erosion).

Based on these findings, we recommend that the USFS withdraw the current DEIS and PNFP documents from circulation and reinstitute a new DEIS process that complies with the requirements of federal law and which meets the high technical standards required of land management agencies.

WPS/kh

LETTER NMDA

NEW MEXICO DEPARTMENT OF AGRICULTURE
DIVISION OF AGRICULTURAL PROGRAMS AND RESOURCES
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July 18, 1985

03 40 1tr scoggin 2*

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

This letter is to respond to your letter number 1920.

Thank you for your clarification of the Federal Land Policy and Management Act (FLPMA) and the National Forest Management Act (NFMA) regarding the land and resource management planning process of the U.S. Forest Service (USFS). You are correct that the NFMA is the appropriate law pertaining to the subject of public participation in the USFS planning process. However, NFMA also contains language on the subject of public participation in the planning process. In my opinion, this language is more specific on the public participation process than the language I referred to in FLPMA. Section 6(d) of NFMA, directs the Secretary of Agriculture to "... provide for public participation in the development, review, and revision of land management plans ..." and to "... publicize and hold public meetings or comparable processes at locations that foster public participation in the review of such plans or revisions."

Although the wording of USFS Regulation 36 CFR 219.6 d differs from the language of NFMA, it is, nevertheless, derived from that legislation. As you mentioned in your letter, "The National Forest Management Act is the guiding legislation." Accordingly, we request that public meetings or comparable processes be publicized and held for the purpose of discussing and commenting on The Gila Draft Environmental Impact Statement and Proposed National Forest Plan (DEIS/PNFP) at locations that foster public participation.

We look forward to receiving notification of these public meetings or comparable processes and to attending whatever public functions you deem appropriate for the Gila DEIS/PNFP. Again, we appreciate your attention to our inquiry and request concerning public participation in the USFS planning process.

Sincerely,

Ronald J. White
Ronald J. White
Director

RJW/kh

cc William P. Stephens, Director/Secretary

LETTER NMDA



United States Department of Agriculture
Forest Service
Gila NF
2610 N Silver Street
Silver City, NM 88061

Reply To 1920

Date: August 8, 1985

Ronald J White
New Mexico Department of Agriculture
Division of Agricultural Programs and Resources
Box 5702
Las Cruces, New Mexico 88003

Dear Mr White

Thank you for your continued interest in the Gila National Forest planning process. We appreciate your concern regarding public meetings on the Gila National Forest Plan and Draft Environmental Impact Statement. We do, however, continue to feel that the approach we are taking is legally acceptable and appropriate to our situation.

Carl Hess, from your office, discussed your concerns with us when we met on July 25, 1985. As a result of this discussion, I feel that we have a better understanding of your needs. We appreciate your need to be able to keep informed of the concerns of other interests and how they are reacting to the planning documents. To help you accomplish this, we plan to contact Carl regularly and inform him of the types of comments we are receiving on the documents. We will also inform him of any meetings we have with individuals and interest groups and give him the opportunity, where possible, to attend these meetings.

We hope this will at least partially satisfy your need to be involved in the public comment process. We will continue to try to contact interested groups and individuals and provide them the personal assistance they need to review the planning documents.

If we can be of further assistance to your agency in your review of the documents or if we can provide you with any other information about the public response to the plan, just call Gerry Engel.

Kenneth C Scoggin
KENNETH C SCOGGIN
Forest Supervisor

GE ge



LETTER NMDA



Department of Agriculture
Silver City, NM 88061

Reply To 1950

Date May 24, 1985

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Dear Reader

Enclosed with this letter is the Gila National Forest planning documents you requested. These are submitted for your review and comment. PLEASE READ THIS LETTER BEFORE READING THE DOCUMENTS. IT CONTAINS SOME IMPORTANT INFORMATION.

We appreciate your involvement in this long and complicated process and believe we have addressed the issues, concerns, and opportunities that have been identified. These issues, concerns, and opportunities (identified on pages 1 and 2 of the Summary of the Draft Environmental Impact Statement) should guide our resource decisions in the coming decade.

To help you identify how the documents were created, a brief summary of the intervening events should be helpful.

Planning on National Forests is conducted under the authority of the Multiple Use-Sustained Yield Act of 1960, and the Forest and Rangeland Renewable Resources Planning Act of 1974, as amended by the National Forest Management Act of 1978. The assessment of environmental consequences of alternatives is prepared in conformance with the National Environmental Policy Act of 1969.

The National Forest Management Act planning process represents a logical, rational, and traceable approach to natural resource decision making. The identification of issues, concerns, and opportunities is the first step in the process. This was accomplished in 1980 by soliciting comments from the public as well as from Forest Service employees. Once the issues, concerns, and opportunities were identified, existing data on range, wildlife, timber, recreation, etc., was gathered. This data was used to determine the potential of the Forest to produce recreation, wildlife habitat, timber, forage for domestic livestock, etc. It was also used to estimate what the Forest would look like in the future if we continue managing the way we have in the past (Current Alternative). Using the information on the Forest's potential, alternative ways to manage the Forest were developed. These alternatives were evaluated and a proposed action alternative was selected. The Proposed Gila National Forest Plan and The Draft Environmental Impact Statement document this process. Public comments will be used to help develop the final Forest Plan.

Following plan approval, the final Forest Plan will guide future management of the Forest. Ordinarily, it will be revised on a 10-year cycle or at least every 15 years. Forest activities will be monitored and evaluated at intervals established in the plan. Implementation will be evaluated on a sample basis to determine how well objectives have been met and how closely management standards and guidelines have been applied.



LETTER NMDA



Reader

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To gain an understanding of the problems associated with continuing under the current management, refer to the description of the Current Action Alternative (Alternative A) in the "Alternatives Considered in Detail" section of Chapter 2 in the DEIS, beginning on page 19 and Table 2-Issue Resolution beginning on page 29. Chapter 4 of the DEIS provides a description of the environmental consequences of implementing each alternative. The chapter is outlined by resource activity.

With a basic understanding of the Current Action Alternative, please refer to the "Alternatives Considered in Detail" section of Chapter 2 beginning on page 18 and Table 2-Issue Resolution beginning on page 29, for a description of the Proposed Action Alternative for comparison to current management. Again, Chapter 4 presents a detailed description of the environmental consequences associated with the implementation of each alternative, displayed by major resource. Other alternatives considered in detail are also displayed in these sections. A detailed description of the proposed management direction for specific parts of the Forest can be found in the Proposed Gila National Forest Plan.

As you review these planning documents, we expect you may find some information and conclusions with which you are in complete agreement and some which you do not accept or which may require further clarification. We encourage you to comment on the Draft Environmental Impact Statement and the proposed Plan. We are interested in your thoughts regarding which alternative you favor over the others, or how portions of the various alternatives may be changed, modified or combined to form a new alternative. To insure that your comments can be taken into account as we enter this final phase of the planning process, refining the Draft Environmental Impact Statement and proposed Plan into the final Gila National Forest Management Plan and Environmental Impact Statement, please send us your comments before the expiration of the comment period on September 8, 1985.

If you would prefer to stop by and visit with us, Forest Offices are open from 8 to 4 Monday through Friday. If you or the group you are affiliated with wish to make arrangements for us to meet with you, contact Gerry Engel in the Forest Supervisor's Office in Silver City.

Thank you for your continued interest in Forest planning. Comments that you provide on the Draft Plan will help us improve the quality of the Final Gila National Forest Plan.

Sincerely,

Kenneth C. Scoggins

KENNETH C. SCOGGINS
Forest Supervisor

Enclosure



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FS-6200 28/7 52/

LETTER NMDA

NEW MEXICO DEPARTMENT OF AGRICULTURE
OFFICE OF THE DIRECTOR/SECRETARY
Box 3189/Las Cruces, New Mexico 88003
Telephone (505) 646-3007



September 6, 1985

03 40 1tr overbay

Mr. James C. Overbay
Acting Regional Forester
U S Forest Service, Region 3
U S Department of Agriculture
517 Gold Avenue, SW
Albuquerque, New Mexico 87102

Dear Mr. Overbay:

This is in response to your letter (No. 1920) dated August 2, 1985, in which you provided a detailed response to our previous comments concerning the concurrent public review of draft Environmental Impact Statements (EISs) and Proposed Forest Plans (PFPs). We appreciate the thoroughness of your rebuttal, as well as the obvious concern you have shown for U S Forest Service (USFS) adherence to federal laws and regulations. Despite your careful analysis, however, we must reiterate our belief that simultaneous reviews of draft EISs and PFPs, as presently performed in New Mexico, are in violation of federal statutes and discourage meaningful public participation.

The National Environmental Policy Act (NEPA) recognizes "that each person has a responsibility to contribute to the preservation and enhancement of the environment" (Sec. 101 [c]). Similarly, NEPA regulations stipulate the responsibility of federal agencies to prepare EISs (Section 1502.3) and to "encourage and facilitate public involvement in decisions which affect the quality of the human environment" (1500.2 [d]). Accordingly, we interpret the EIS to be a document that is intended, in part, to encourage and facilitate the individual's realization of his social and ecological responsibility to the environment.

Section 1502.14 of NEPA regulations refer to the presentation of alternatives, including the proposed action, as "the heart of the Environmental Impact Statement." Section 1502.14 (b) of NEPA regulations directs the concerned agency to "Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits." Clearly, if the regulations reflect NEPA, Congress intended that environmental alternatives be presented fairly and equally in the draft EIS process. Although the USFS has presented alternatives fairly and equally in the draft EIS document, it is our contention that the USFS has not presented alternatives fairly and equally in the draft EIS process.

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LETTER NMDA

LETTER NMDA

U.S. DEPT. OF AGRICULTURE

Mr. James C. Overbay
September 6, 1985
Page 2

The draft EIS process, as currently conducted in New Mexico, involves the concurrent review of the draft EIS and PFP documents by the public. In our opinion, the inclusion of the PFP in the draft EIS process effectively biases the reviewers ability to evaluate the comparative merit of all alternatives by focusing unequally and unfairly upon a single alternative. The proposed action. Although the PFP is not an environmental analysis document, the mere fact of its simultaneous presence, and the authority it implicitly imparts, serves to persuade the reviewer of the relative superiority of the proposed action and discourages the reviewer's impartial participation in the draft EIS process by fostering a belief, correct or not, that the proposed action is a fait accompli.

Your letter (last two sentences in paragraph two), states that forest planning regulations 36 CFR 219.10 (b) and 36 CFR 219.12 (a) require concurrent review of the draft EIS and PFP documents. We disagree, however, because regulation 36 CFR 219.10 (b) states only that an EIS and PFP "be available for public comment for at least 3 months." There is no stipulation in this regulation that the two documents should or must be reviewed simultaneously. Similarly, planning regulation 36 CFR 219.12 (a) does not mandate a single process for satisfying planning requirements and NEPA, as suggested in your letter. Planning regulation 36 CFR 219.12 (a) requires a single process only "to the extent feasible." We believe feasibility, in this instance, must be predicated upon compliance with NEPA.

You also refer (paragraph three of your letter) to NEPA regulations 1500.2 (c), 1501.2 (b), 1502.25 (a), and 1506.4, as supporting the contention that concurrent reviews are mandated. Again, we disagree with these conclusions. NEPA regulations 1501.2 (b) and 1502.25 (a) refer only to the concurrent review of related environmental analysis documents. A PFP is a plan of action, not an analysis document. NEPA regulation 1506.4 merely states that a draft EIS may be combined with any other agency document to reduce duplication and paperwork. In our opinion, this regulation is intended to eliminate agency redundancy associated with the issuance of otherwise identical and logically synthesized documents. The draft EIS and PFP are distinct documents not amenable to physical merger or concurrent review. Finally, NEPA regulation 1500.2 (c) stipulates only that planning and environmental procedures run concurrently to the "fullest extent possible." Again, our contention is that concurrence is not possible given the statutory language and intent of NEPA.

In our opinion, these regulations simply do not support the USFS contention that concurrent reviews are required. Other agencies, such as the Bureau of Land Management (BLM), are subject to identical NEPA guidelines. However, the BLM issues draft EISs and land management plans consecutively, not concurrently. To date, we are unaware of any claim that such actions by the BLM are in violation of federal laws or regulations. We do not deny that NEPA provides the authority, even the encouragement, for concurrent reviews and single processes under certain circumstances. We contend, however, that NEPA does not mandate such concurrence. We also believe that NEPA cannot be used in support of current USFS draft EIS processes in New Mexico. Indeed, our analysis suggests that a single review process for draft EIS and PFP documents is in clear violation of NEPA and the intent of Congress.

Mr. James C. Overbay
September 6, 1985
Page 3

We recognize, however, that an alternative exists which would permit concurrent review of the draft EIS and PFP within the regulatory bounds of NEPA. Your letter mentions (paragraph six) that the USFS has prepared, fully developed, and analyzed different PFPs for each of the alternatives presented in the Carson and Cibola draft EISs. These different PFPs were apparently not distributed to the public in the single review process adhered to by the USFS in New Mexico. If they had been distributed to the public in a format equivalent to the PFP for the proposed action alternative we would not have found it necessary to contest concurrent review.

We believe this alternative would have been impractical. Accordingly, we believe consecutive review is practical and consistent with NEPA and National Forest System Land and Resource Management Planning regulations. We urge the USFS in New Mexico to reconsider the draft EIS process in light of our analysis and in view of the responsibility of the USFS to the general public. That responsibility is no less than the assurance that each person be given a meaningful opportunity to contribute to the preservation and enhancement of his environment (NEPA Section 101 (c)). Consecutive review is a significant step toward fulfillment of that responsibility.

Thank you for the opportunity to comment on this matter. If you wish to discuss it further please feel free to contact me.

Sincerely,


William F. Stephens
Director/Secretary

WFS/kh

LETTER NMDA



Department of
Agriculture Service

211 Gold Avenue, SW
Albuquerque, NM 87102

Reply To 1920

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Dr William P Stephens, Secretary
Department of Agriculture
State of New Mexico
Box 3189, NMSU Campus
Las Cruces, New Mexico 88003

Dear Dr Stephens

Several Forests have received comments on Forest Plans from you that question the procedure of concurrent review periods for proposed Forest Plans and Draft Environmental Impact Statements. We disagree with your conclusion that concurrent review periods for draft Environmental Impact Statements and proposed Forest Plans violate Federal statutes and discourage meaningful public participation. In our opinion, the opposite is true. There are a number of regulations which support our procedure. In addition to the procedure being legally mandated, there is good rationale behind our procedure, and we believe it provides the public a meaningful opportunity to understand and influence future management of the forest.

Environmental Impact Statements and Forest Plans are distinct documents prepared in accordance with different laws and regulations. Both documents have legally mandated public review requirements. Environmental Impact Statements are prepared in accordance with the Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA) (40 CFR 1500-1508). Forest Plans are prepared under the regulations for National Forest System Land and Resource Management Planning (36 CFR 219). The NEPA regulations require that environmental impact statements be available for public review for at least 45 days (40 CFR 1506 10(c)). The National Forest Management Act requires that proposed Forest Plans be available for public review for at least 3 months (16 USC 1604(d)). The planning regulations require both public review periods be at least 3 months and that they run concurrently (36 CFR 219.10(b)). The planning regulations also require that a single process be used to satisfy both NEPA and planning requirements (36 CFR 219.12(a)).

In addition to the requirement to have concurrent review periods in 36 CFR 219 10(b) and 36 CFR 219.12(a), NEPA regulations provide for concurrent reviews in several places. Section 1500.2(c) requires that NEPA requirements be integrated with other planning and review requirements and that procedures will run concurrently rather than consecutively. Section 1501 2(b) reiterates that environmental documents be circulated and reviewed at the same time as other planning documents. Section 1502 25(a) again states that environmental impact statements should be concurrent with products and requirements of other laws and regulations. Finally, Section 1506.4 provides for combining documents



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LETTER NMDA

Dr Stephens

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Clearly concurrent review of environmental impact statement and proposed Forest Plans is in compliance with legal requirements and follows the intent of Congress.

Even without the clear legal mandate, concurrent review periods for environmental impact statements and proposed plans are logical.

To understand the rationale, it is necessary to view the documents separate from the analysis process preceding them. A number of alternatives were analyzed. These alternatives are different proposed forest plans which were all fully developed and analyzed. Each alternative is a combination of choices made from a wide range of prescriptions and timing options which were considered. The alternatives were evaluated on how each maximized net public benefits. Once analysis and evaluation were completed, one alternative was selected as the Forest Service Preferred Alternative or Proposed Forest Plan.

Once the preferred alternative was identified, the environmental impact statement was prepared to disclose environmental consequences associated with the preferred alternative and all other alternatives. The proposed Forest Plan was prepared to provide the details on how, when, and where the proposed plan could be implemented. The Forest Plan translates the results of analysis into integrated management direction in a readable format for specific geographic locations.

We believe the public is mainly interested in what is being proposed in specific locations and how management on the ground will actually be carried out if the proposed plan were implemented. The proposed forest plan provides this information while the environmental impact statement provides information on environmental consequences on a forest-wide basis. Both are necessary for the public to make informed comments.

Based on the volume and quality of comments we have received, public participation has not been discouraged. Many changes have been made in the environmental impact statements and proposed plans. We have found that specific comments on proposed plans are very constructive and help us be responsive. However, without information that sheds new light on analysis and evaluation of alternatives, voting on alternatives is of little value. On the other hand, working toward a more implementable plan is very productive. Circulating proposed plans along with the environmental impact statements helps focus on getting the best possible plan implemented on the ground.

PROPOSED forest plans are the result of analysis and evaluation of several plans documented in a DRAFT environmental impact statement. Therefore, these are not "de facto" plans. They are not final and changes are being made in response to public comments.

In summary, we believe there are legal and sensible reasons for the review procedure and that productive public comment has been fostered rather than hindered.

Sincerely,

James C. Overbay
JAMES C. OVERBAY
Acting Regional Forester



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LETTER NMDA

LETTER NMDA

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General
Counsel

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25 JAN 1985

MEMORANDUM

TO : R. Max Peterson
Chief, Forest Service

Attention: Everett Towle
Director, Land Management Planning

FROM : James P. Perry
Deputy Assistant General Counsel
Natural Resources Division

SUBJECT: Observations on the Legal Sufficiency of Forest Plan EIS's

Through the end of 1984, this office had reviewed several dozen draft EIS's on forest plans and a slightly lesser number of draft plans. These reviews and the comparative evaluation of various EIS's and plans have given us a wider perspective on the legal problems inherent in the land management planning process established pursuant to the National Forest Management Act and the National Environmental Policy Act. We have found several areas which we believe deserve particular attention as the planning process continues.

The first involves the development and treatment of alternatives offered in the forest plan EIS's. In general, we have found that the alternatives for most forest plans are rather narrowly drawn, and often do not provide the "broad range" of alternatives required by the National Environmental Policy Act. Instead, the alternatives offer a rather constrained selection of both resource outputs and management approaches. We do not dispute that such a range of outputs may be reasonable from a prudent forest manager's standpoint; however, the National Environmental Policy Act requires a full exploration and a "hard look" in "good faith objectivity" at a broader range of alternatives than those few most likely to be selected by the prudent manager. Thus, too often, we find timber, minerals outputs, together with recreation, and wilderness proposals to be concentrated in a very narrow spectrum which does not offer or explore the full range of possibilities available to the decisionmaker. Just as in the RARE II case, where the agency was found wanting for having only one alternative beyond the range of a 33-percent allocation to wilderness, the alternatives of the forest plan offer limited choices for the manager, decisionmaker, Congress, or public who may wish to explore innovative methods or substantial changes in federal land management policy.

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A second major concern we have regarding the formation of alternatives is the disregard given to selective cutting or uneven-age management in the forest plan EIS's. According to the Fourth Circuit in the Monongahela case, from 1897 to 1974, the only legal method of harvesting timber in the national forest was selective cutting systems. Further, the case law contains several statements, although incorrect, which indicate that the Forest Service only began widespread clearcutting in 1964. Nonetheless, even though a substantial segment of the public seems to oppose even age management as a predominant harvest method, we recall no forest plan which has included an alternative which used selective cutting as its principal harvesting method. Although selective cutting may not be a method which could be successfully used on a forest-wide basis, we strongly suggest that it is an alternative which under NEPA must be vigorously explored and objectively evaluated by the Forest Service in accordance with 40 C.F.R. 1502.14(a).

The preferred method for this exploration would be the development of an alternative which used predominantly selective cutting systems. Such an alternative could then be fully analyzed but not selected by the decisionmaker. Another, though riskier, approach which we have identified is an exploration of selective cutting as a matter considered but not deserving of detailed study as an alternative under 40 C.F.R. 1502.14(a). In order to dismiss selective cutting, we have indicated that it would be necessary for the Forest Service to develop some on-the-ground figures to show the results of selective cutting in the terms of miles of roads entries, harvest levels, and costs. Absent one of these two approaches, it seems likely from the state of the law that the Forest Service would not survive a well drawn legal challenge by proponents of selective cutting who need not prove that selective cutting was an appropriate choice, but merely that the Forest Service did not adequately consider a "reasonable," "obvious," and "appropriate" method which has recognition both at law and in forest literature.

It is not solely the arguable lack of NEPA compliance on silvicultural systems that disturbs us. The National Forest Management Act (NFMA) at Section 6(g)(3)(F) requires that clearcutting where utilized be determined to be the "optimum" method. Other even-age practices such as seed tree cutting and shelterwood cutting must be determined to be "appropriate" under Section 6(g)(3)(F). Analysis of competing methods such as selective cutting (all age or uneven-age management) would be a persuasive method of demonstrating that the Section 6 NFMA tests were met. We believe that a compelling case can and should be made for the use of clearcutting in the Forest Plan and EIS. This justification should be supported by more than conclusory statements, but consist of analysis demonstrating the greater resource benefits of the method chosen. Clearcutting is only arguably preferable if no application of other systems, such as uneven-age management have been attempted.

We point out that proponents of selective cutting such as Leon Minckler continue to write regularly in forest publications, and that in Texas Committee on Natural Resources v. Butts, 433 F. Supp. 1235

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LETTER NMDA

(1977), the district court, although subsequently reversed on other grounds, found great harm in clearcutting when compared with selective cutting systems. Further, that case involved a geographic area which did not contain many of the elements which make even-aged management more difficult, such as steep slopes and volcanic or loose soils. Also, it is our understanding that public comments made on some of the eastern forest draft EIS's and plans have begun to raise the selective cutting issue.

Our comments in evaluating individual plans and draft EIS's have repeatedly questioned the legal sufficiency of the discussion of harvest methods. As the eastern forests mature in the coming decades and more substantial cutting is planned, there may be further adverse public reaction. Even if the EIS and plan are not appealed immediately, without adequate consideration of alternative cutting methods, the plans may be successfully challenged later. In forests west of the Mississippi, technical arguments supporting uneven-aged management may be less persuasive. Nevertheless, opponents of the Forest Service timber sale program can still avail themselves of a lack of analysis contained in forest plan EIS's to halt harvest activities.

A third area of concern is the depth of analysis of the impacts of the timber program in forest plan EIS's. In many cases, we believe the forest plan EIS's may contain substantially less information on timber harvesting and its environmental consequences than did previous timber management plans on which EIS's were generated. This lack of specificity is a substantial concern when individual timber sales may subsequently be challenged. Such sales will hopefully be supported by a quality EA. (But see CGC memo of January 1985, attached.) For consideration of the cumulative impacts of timber sales, it will be necessary to tier such EA's to a forest plan EIS or another umbrella EIS. Our concern is that there is insufficient information in the forest plan EIS's to allow EA's on individual timber sales to tier pursuant to 40 C.F.R. § 1508.20. Assuming that the information in forest plan EIS's does not sufficiently detail the limits of disturbance in watersheds, sedimentation levels, wildlife impacts, and other cumulative effects on other resources, the agency will be unable to show adequate consideration of environmental impacts required by NEPA. In such an instance, the agency might well be in an even less defensible situation than it was prior to the forest planning process.

Therefore, we urge an evaluation of the information contained in the forest plan EIS's to ensure that it will be of sufficient specificity to allow tiering of various individual timber sale projects. Assuming it is not desired to reach that level of specificity to allow tiering due to other management constraints, then we urge that the agency consider in what form its NEPA obligations will be met. One "solution" would be an intermediate EIS on timber sale programs. This problem in some ways relates to the forest monitoring system which is to be established under the plan, and which would allow the Forest Service to defend against claims that the cumulative impacts of its activities have exceeded the bounds contemplated in the plan itself.

LETTER NMDA

Our concern has been heightened in meetings with various Forest Service planning personnel in which the individuals flatly state that it is not possible to tier from a timber sale EA to the EIS on the forest plan due to lack of specificity. We understand that one forest in Region 2, when faced with the challenge of a number of sales in a previously unroaded area, chose to do an EIS on the group of sales rather than rely on the forest plan EIS. We only suggest that if the agency proposes to rely on this ad hoc approach to the problems of analyzing cumulative effects of timber sales under an EIS on a forest plan, then it ought to be a conscious decision with every effort to maximize the chances for success.

We will be glad to discuss these matters with your staff.

cc: George M. Leonard, FS, TM
David Ketcham, FS, EC

LETTER NMDA

NEW MEXICO DEPARTMENT OF AGRICULTURE
Agricultural Programs and Resources
Box 5702/Las Cruces New Mexico 88003
Telephone (505) 646 2642



April 14 1983

Mr William Snyder
Director Range Management
U S F S Southwest Regional Office
517 Gold Avenue S.W.
Albuquerque New Mexico 87102

Dear Mr. Snyder

Our Department is evaluating the effects of wilderness designation in New Mexico upon the livestock industry. Specifically, we are seeking information pertaining to permittees whose allotments fall totally or partially within designated wilderness or primitive areas. Toward that end we are requesting information on the following items pertaining to livestock numbers in New Mexico wilderness or primitive areas in the year immediately prior to their congressional or administrative designation as wilderness or primitive areas

1. Please provide livestock preference (AUMs), plus committed use, permitted use and authorized nonuse, for each area identified by allotment number and permittees' names. We also request the class of livestock in each allotment. If only part of the allotment is within a designated area please include the percentage of acreage that is within the designated area.
2. The same information requested in number one but for 1982

We realize this is a rather "cumbersome" task. Thus, the enclosed draft tables are provided as a suggestion. Please feel free to call to discuss this if the request requires clarification.

Sincerely,

Ronald J. White
Ronald J. White
Director

Enclosures: Draft Suggested Tables

LETTER I-SHPO

FOREST SERVICE RESPONSE TO LETTER I-SHPO



TONEY ANAYA
GOVERNOR

STATE OF NEW MEXICO
OFFICE OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

VILLA RIVERA, ROOM 101
228 EAST PALACE AVENUE
SANTA FE, NEW MEXICO 87503
(505) 827-8320

THOMAS W. MERLAN
DIRECTOR

CLARA AFODACA
CULTURAL AFFAIRS OFFICER

October 3, 1985

MEMORANDUM

H-227

TO Dan Lopez, Secretary
Department of Finance and Administration

FROM Thomas W. Merlan, Director *TM*
Historic Preservation Division

RE Review of Proposed Gila National Forest Plan and Draft
Environmental Impact Statement

Thank you for the opportunity to review the above documents for cultural resource concerns. Our comments are divided into several parts:

- I Overall assessment of the Plan/DEIS
- II Summary of management situation and affected environment
- III Management direction
- IV Monitoring plan
- V Recommendations

I OVERALL ASSESSMENT OF THE PLAN/DEIS

Overall, the two documents provide an extremely cursory overview of cultural resources on the Gila Forest. The generalized nature of the cultural resource discussion does not provide enough specific information to make an independent assessment of the impact of the proposed alternatives on cultural resources.

Forest planning regulations (36 CFR 219.24) require that interactions between cultural resources and other multiple resource uses be examined in the formulation and analysis of alternatives. The Forest planning process should be used as an opportunity to analyze the interaction of all classes of resources. However, cultural resources appear to have been a peripheral concern in the planning process. The Plan and DEIS fail to analyze cultural resource data for any of the approximately 40 management areas that are identified, in spite of the fact that detailed resource information is given for a number of other resource classes. Cultural resources receive little mention in the description of the various alternatives that appear on pages 11-59 of the DEIS. Analysis of impacts to cultural resources is presented only in relation to the amount of ground-disturbance anticipated, rather than to the full range of activities.

The management of cultural resources on the Gila Forest is of concern since the 3.3 million acres administered by the Gila Forest represent approximately one-third of the Forest Service's holdings in New Mexico. The 40,000 to 65,000 sites that the DEIS and Plan estimate to be present in the Forest are approximately equal to the number of all sites across the State that have been recorded to date in the State's archaeological inventory. Given the number of sites that may be affected by the proposed Plan, it is essential that the Plan establish a strong and affirmative program for their protection. The Plan falls short of doing this at the present time.

SHPO-1

The standards and guidelines in the Forest Plan have been changed to provide more detail on how we will comply with the National Historic Preservation Act and the proposed settlement agreement to the Save the Jemez et. al/ State of New Mexico vs. Forest Service litigation. The proposed settlement includes a commitment to prepare a Forest-wide cultural resource management assessment within 18 months.

The existing overviews for the north and south halves of the Gila will be reviewed and updated for the management assessment. The Forest Plan standards and guidelines for Cultural Resources include a more detailed description of the management topics that will be included in the management assessment document.

II AFFECTED ENVIRONMENT AND SUMMARY OF MANAGEMENT SITUATION

An extremely brief summary of the status of the cultural resource program is presented on pages 12-13 of the Plan and pages 77-78 of the DEIS. As written, the documents provide only broad generalizations regarding the overall status and aims of the cultural resources program. It would be far more informative if the documents also presented quantified results and actions.

We recommend that these sections of the documents be revised to include a more specific discussion of present cultural resource management practices on the Gila Forest as well as the status of inventory across various parts of the Forest. At a minimum, we recommend that the following information be included in chart or table format in the revised Plan and DEIS:

- 1 # of acres inventoried across the Forest as a whole, by year
- 2 # of sites presently documented across the Forest as a whole, by temporal/cultural time period
- 3 # of acres inventoried to date in each Ranger District at present
- 4 # of sites documented to date in each of the Ranger Districts
5. present condition of documented sites across the Forest as a whole (# vandalized, # excavated, # eroded, # undisturbed)
- 6 # of sites that have been stabilized in the Gila Forest
- 7 # sites that have been determined eligible on the Gila Forest

Much of this information is recorded on the Forest Service's computerized archaeological inventory, so it should not be difficult to produce. Information such as this would give the public a far better idea of the adequacy and limitations of cultural resource management on the Gila Forest than what is included in the Plan at present.

In addition, we recommend that the Forest prepare a more detailed evaluation of cultural resources and cultural resource management needs in the various Ranger Districts and also in the 40 identified management areas of the Gila Forest. This analysis should address the specific items included in Forest planning regulation 36 CFR 219.24, such as identifying areas requiring additional inventory, known sites requiring maintenance or special attention, and opportunities for public interpretation and education.

Given limitations on space in the DEIS and Plan, this latter analysis could be done as a separate technical document, rather than included in the documents themselves. However, the preparation of this management document should be done as part of the Plan and DEIS revision process, so that cultural resources are effectively introduced into the long-range planning process for the Gila Forest. This should have been done as part of Plan preparation.

As the Plan and DEIS presently written, it seems that cultural resources will be given effective consideration only at the stage of project implementation—i.e., by means of inventory, avoidance, or mitigative measures taken shortly before project implementation—rather than being included in the planning process. According to the documents, non-project related actions will be taken only "as feasible" or in an extremely limited manner (such as attempting to register only 10 of the potential 65,000 sites on the Forest over the next ten years).

Yet Forest planning regulations and 36 CFR 800 both indicate that cultural resources are to be taken into account at the early stages of planning. Preparation of a more detailed cultural resource management document would enable the Forest to start this process in a more effective way.

It should be pointed out that the two overviews that are referenced in the Plan and DEIS are good summaries of work completed prior to 1980 in southwestern and west central New Mexico. However, they do not provide the type of management information that is needed to integrate cultural resources into the type of specific land use and resource allocations that are addressed in the ten year Plan. Neither do they provide the kind of information that is needed to make management decisions regarding the allocation of staff and funding necessary to accomplish various cultural resource goals.

For example, it is clear that vandalism is a severe problem on the Gila Forest. There are a number of ways to approach this problem, including both law enforcement and public education. More specific analysis of the cultural resource management situation in particular parts of the Forest could help analyze the relative utility of various approaches and better focus the allocation of limited funds and staffing across the Forest. These are the types of problems that could be addressed in a separate management document to enhance the effectiveness of the planning process.

SHPO-2

The DEIS and Plan will include one or more figures that summarize most of the data requested on the status of inventory, site recordation, site conditions, and National Register eligibility determination for cultural resource sites on the Gila. These topics will be considered in greater detail in the management assessment document.

As a point of editing, the statements on page 15 of the Plan that "all sites on or nominated to the National Register will be protected" and on page 78 of the DEIS that "all sites on or nominated to the National Register will be protected and monitored" should be changed to "all sites on or eligible for nomination to the National Register will be protected and monitored" to be more consistent with the National Historic Preservation Act. As presently written in the Plan and DEIS, this level of protection applies to only two out of the possibly 65,000 sites in the Forest. It is safe to assume that a number of other sites will also require protective actions. Provision should also be made in the Plan for protection of sites which may be eligible for the National Register, but which have not yet been evaluated.

It is also inconsistent with Section 110 of the NHPA to indicate that other sites will receive attention only if they are threatened by development-related activities, as suggested on page 78 of the DEIS. This again suggests that cultural resources are a secondary concern in Forest management activities. The inventory, evaluation, and protection of sites should be conducted on an ongoing basis, rather than just in activity-related contexts.

III MANAGEMENT DIRECTION

The recommendations for cultural resource management in wilderness areas are inconsistent with the National Historic Preservation Act. I know of no legal basis for the conclusion that sites in wilderness areas must be allowed to deteriorate. Rather, wilderness designation would appear to limit the manner in which protective actions could be conducted, rather than entirely prohibiting maintenance. The management directions for wilderness areas should be changed to provide for appropriate maintenance activities that would be both consistent with the Forest's affirmative responsibilities under Section 110 of the NHPA and compatible with wilderness qualities. The Plan should also provide for site inventory, evaluation, and surveillance in both wilderness and non-wilderness areas.

For sites outside of wilderness areas, we note that cultural resources will be managed in accordance with the State Historic Preservation Plan and planning activities of the State Archaeologist. To facilitate this general goal, we encourage the Gila Forest to provide copies of its archaeological site and survey records on a routine basis to the State's Archaeological Records Management System. We would be pleased to meet with Forest staff to discuss appropriate mechanisms for doing so. The present segmentation of cultural resource information makes it difficult to assess the regional significance of sites, and considerably complicates the management process when more than one managing agency is involved in a particular action.

The management prescriptions include reference to completion of non-project specific inventory, evaluation, and protection. However, we would prefer to see a far stronger commitment to such responsibilities. Completing ten National Register nominations over a ten year period seems like an extremely conservative target when there may be 65,000 sites in the Forest. We suggest that a more appropriate figure would be ten nominations per year.

We also suggest that nominations focus on thematic group and district nominations. Such nominations provide an efficient mechanism for nominating a number of sites with a minimum of paperwork. Much of the basic field work for a number of sites has already been completed, which would also expedite the nomination process.

Final priorities for nominations should be defined as part of an analysis of the overall cultural resource program for the Gila Forest suggested previously. However, we suggest a number of tentative priorities for group nominations, focusing primarily on known sites in the various drainage basins in the area. Such priorities for group nominations could include the lower Gila River, Lower Gila Box, West Fork of the Gila River near Gila Cliff Dwellings, Turkey Creek, Whitewater Creek, Sapillo Creek, Upper Mimbres River Valley, Bear Canyon, Upper San Francisco River drainage, Upper Palomas Creek, Upper Percha Creek, Upper Las Animas Creek, Blue Creek, Pine Creek, San Francisco River Box, and the Jewett Gap area. The Forest could also approach the nomination process by using temporal/cultural thematic groups as suggested in Prehistoric New Mexico.

SHPO-3

In order to provide consistency, the statements on page 13 of the Plan and page 78 of the DEIS have been changed.

SHPO-4

The new standards and guidelines for cultural resources management have been added to the Plan. These standards and guidelines provide for prioritization of areas within the Forest for non-project related inventories. At a minimum, 50 to 100 acres of such backlog survey will be accomplished per archaeologist or para-professional archaeologist per year. We estimate that 700 to 3000 acres of backlog inventory will be accomplished by Gila personnel each year from 1987 to 1991. Areas suggested by the State of New Mexico in their comments to the Gila Plan will be considered during preparation of the management assessment document.

SHPO-5

Sites in the Wilderness will be inventoried and evaluated in conjunction with projects or as backlog survey as scheduled by the Management Assessment document. Sites in the Wilderness will be given the same consideration for maintenance and stabilization as sites outside the Wilderness. Evaluation of historic sites in the Wilderness will be emphasized to allow removal of the remains of Man's influence in the Wilderness that is determined not to have National Register significance.

SHPO-6

Forest Service site forms are now routinely sent to SHPO with survey and clearance documents. Automated data from the existing Forest Service data base will be provided at a later date.

SHPO-7

The revised Forest Plan Cultural Resources Standards and Guidelines establish a minimum requirement of two National Register nominations per full-time professional per year or a combination of district, thematic, or group nominations. The management assessment for cultural resources will establish priorities and schedules for National Register nominations. Areas suggested in the State of New Mexico's comments will be considered during preparation of the management assessment document.

LETTER I-SHPO

FOREST SERVICE RESPONSE TO LETTER I-SHPO

Priorities and specific annual targets for non-project specific inventories should also be established as part of an overall cultural resource management analysis. Forest planning regulations require that areas requiring additional inventory be identified. The priorities that the Plan outlines for such inventory are general criteria, rather than specific areas requiring additional inventory. Further analysis of Forest data during the Plan revision process should result in definition of specific priority areas for additional inventory. However, we also suggest the following areas where generally little work has been completed to date: Mogollon Mountains, Mangas Mountains, Escondida Mountains, the north side of the Gallo Mountains, Elk Mountain, Bear Mountain, Burro Peaks, the area to the north and northeast of Highway 78, north and northeast of Highway 59, the valley to the west of the Black Range, and the White Rocks area near the Arizona border.

Completion of a cultural resources overview in conjunction with the Bureau of Land Management is a good goal for the 10 year planning period. However, as a shorter term goal, we recommend that the Plan include a commitment to publishing the existing overview by LeBlanc and Whalen. Since that study was largely completed in final form in 1980, publication would be a reasonable goal for the early part of the planning period. After that document is published, it would be an excellent idea to cooperate with the Bureau of Land Management on an update.

Regarding the management directives concerning public education and interpretation, we encourage the Forest to include more results-oriented goals, such as accomplishing a defined number of public presentations per year or preparing a selected number of interpretive materials. In the long term, investing in public education and interpretation should be a valuable tool in combatting the problem of vandalism. While continuing efforts at law enforcement under the Archaeological Resources Protection Act of 1979 are essential, patrol activities alone are not going to be enough to prevent vandalism, as noted in the documents. We encourage the Forest to develop more active outreach programs to involve the public and to work in cooperation with local museums to insure that exhibits of archaeological materials from the Gila area are available for people to view locally.

As a point of editing, the management directives should include a specific statement that cultural resources will be managed in accordance with the provisions of the National Historic Preservation Act of 1966 as amended and with implementing regulations and Executive Order 11593. In this regard, it should be stated in the Plan that determination of inventory needs will be done on a project-specific basis, in accordance with the consultation procedures outlined in 36 CFR 800. The qualifications of those completing the inventories should also be specified. Use of para-professional individuals should be done only with adequate levels of direct field supervision by professionals.

IV MONITORING PROGRAM

As noted in the Plan, the purpose of the monitoring program is to inform the decisionmaker of the progress that has been made toward achieving the goals, objectives, and management directives of the Plan. Two individual items are included for cultural resources:

SHPO-8

Updating and/or consolidation of the overviews for the north and south halves of the Gila will be considered in the management assessment. The Forest will investigate methods of making the south half overview more available, but we do not agree that there is a widespread need to publish it without drastic revisions. Most of the chapters in the LeBlanc and Whalen overview are now available in more recently published works by LeBlanc, Anyon, Gilman, Nelson, et al.

SHPO-9

The Gila cooperates with Western New Mexico State University Museum in Silver City by providing review of exhibits and storing artifacts recovered from Forest Service sites. The Forest Archaeologist or his staff presents lectures to Elderhost, public school, and university classes on topics relating to archaeology, history, and cultural resources law enforcement. Exhibits are planned for ranger stations in several communities and other locations will be considered in the management assessment. The Forest Service has interpretive sites at Lake Roberts, the Gila Cliff Dwellings, the Catwalk, and at Pinos Altos. The interpretive site near Pinos Altos has recently been developed in cooperation with the Gila Fish and Gun Club and the State Highway Department. The Grant County Archaeological Society's monthly field trips routinely visit Forest Service sites, usually accompanied by the Forest Archaeologist. Additional educational and interpretive opportunities will be identified in the management assessment.

SHPO-10

The Standards and Guidelines in the Plan have been modified. They now reference the appropriate laws and regulations and provide for better compliance with the National Historic Preservation Act. Qualifications of inventory personnel and levels of professional supervision are being established by the Region 3 Regional Office.

LETTER I-SHPO

We note that the Forest will monitor the condition of sites listed in or eligible for inclusion in the National Register of Historic Places, and that protective actions will be undertaken if vandalism or natural deterioration threatens the integrity of a site. This item is essential to fulfilling the Plan's Section 110 responsibilities. The Plan notes that \$500 has been allocated for the preparation of this annual report. How much funding has been allocated in the Plan for completion of the actual protective actions required to stabilize sites? How many sites does the Plan estimate can be stabilized per year with the funding allocated in the Plan? Such target figures should be specified in the Plan.

The second item that will be monitored for cultural resources is inspection of development projects to insure that they have been adequately inventoried and that all sites have been avoided. Such periodic inspections are essential to insure that cultural resources are adequately protected during resource development activities. As part of this item, Forest staff might also periodically inspect the condition of sites located in areas characterized by dispersed activities such as grazing, ORV travel or other recreational use to insure that such uses are not adversely affecting sites.

We also recommend that the monitoring plan be modified to include an annual assessment of the Forest's progress on other items included in its cultural resource program such as law enforcement, education and interpretation, completion of National Register nominations, and non-project related inventories.

V. RECOMMENDATIONS

Overall, we recommend that the cultural resource sections of the Plan and DEIS be revised prior to the issuance of the final documents, in accordance with the specific suggestions included in the above review. It is particularly important that the Plan and DEIS revision process include a more in-depth analysis of cultural resource management concerns on various parts of the Forest. This is necessary since the present documents appear to have been based on minimal analysis of existing cultural resource data. It is essential to incorporate cultural resource protection into the earliest stage of planning, rather than assuming that such protection can be adequately achieved at the stage of project implementation.

If we can provide clarification of any of the above, please let us know.

FOREST SERVICE RESPONSE TO LETTER I-SHPO

SHPO-11

The management assessment will identify and prioritize sites requiring stabilization. Minimum funding levels for stabilization in Region 3 have been set at 5 percent of the Regional budget or a minimum of \$50,000 per year. Levels for monitoring and inspecting sites have also been set by the Region 3 Regional Office. The Forest Service cultural resources program will be revised annually.

SHPO-12

Final planning documents will include the new standards and guidelines, editing of specific sections noted above, and the additional information requested in comment #2. An in-depth analysis of the cultural resources management situation for the forest will be included in the management assessment document. If necessary, the Plan can be amended based on the results of the cultural resource management assessment document.

LETTER I-SHPO



Department of Agriculture

GOVERNOR'S CABINET

Box 3189 NMSU Campus
Las Cruces, New Mexico 88003
Phone (505) 646-3007

RECEIVED OCT 1 1985

WILLIAM P. STEPHENS
Secretary

TONEY ANAYA
Governor

September 27, 1985

03.40 ltr tixier 4

Department of Finance and Administration
Clearinghouse
State Capitol Building
Santa Fe, New Mexico 87503

Attention Ms. Susan Tixier

Dear Sirs

Enclosed are our comments on the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan and the letter transmitting those comments to Mr. Kenneth C. Scoggin, forest supervisor, Gila National Forest

If there are questions, we will be glad to discuss them

Sincerely,

W.P. Stephens
William P. Stephens

WPS/kh

Enclosures A Review and Analysis of the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan
Letter transmitting comments to Mr. Kenneth C. Scoggin

LETTER I-SHPO



Department of Agriculture

GOVERNOR'S CABINET

Box 3189 NMSU Campus
Las Cruces, New Mexico 88003
Phone (505) 646-3007

RECEIVED OCT 1 1985

WILLIAM P. STEPHENS
Secretary

TONEY ANAYA
Governor

September 27, 1985

03 40 ltr scoggin 7

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

The enclosed document represents the comments of the New Mexico Department of Agriculture on the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan

Thank you.

Sincerely,

W.P. Stephens
William P. Stephens

WPS/kh

Enclosure A Review and Analysis of the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan

LETTER 2



000002

Forest Supervisor
Gila National Forest

October 1, 1985

Dear Supervisor

In response to your draft land use management plan for the Gila National Forest, the following is the Earth First! Alternative for Management of the Gila National Forest:

1 The North Star Road should be closed and the Gila and Aldo Leopold Wilderness Areas combined into one unified Wilderness of 1,300,000 acres. Other minor dirt and gravel roads around the periphery should also be closed and reclaimed, and the two small reservoirs of Wall Lake and Snow Lake removed. The paved road into Gila Cliff Dwellings National Monument and developments in the area should be phased out over the next decade.

2 Twelve other Wilderness Areas should be established (see map) totalling one million acres. Dirt roads should be closed, old timber cuts rehabilitated, and other developments removed to establish the following areas:

- A Sawyer's Peak 90,000 acres
- B Meadow Creek 40,000
- C Gila Middle Box 72,000
- D Hells Hole 30,000
- E Blue Range/San Francisco River 165,000
- F Mogollon Mountains 150,000
- G Tularosa Mountains 275,000
- H Frisco Box 40,000
- I Wahoo Peak 60,000
- J Escondido Mountain 55,000
- K Funny Rocks 20,000
- L Fox Mountain 15,000

Acreages are approximate and there are adjacent acreages in Arizona for the Hells Hole and Blue Range/San Francisco River areas (acreages are given only for the New Mexico portions)

FOREST SERVICE RESPONSE TO LETTER 2

2-1

We disagree that the North Star Road should be closed and that Wall Lake and Snow Lake should be removed. The North Star Road provides valuable administrative and recreation access to the northern portions of the Forest. Elimination of the road would decrease the opportunities for recreationists to use the northern portions of the Forest and would make administration more costly and less effective. The two lakes to which you refer provide valuable water oriented recreation opportunities in a part of the country where such opportunities are limited.

We also disagree that the road to the Gila Cliff dwellings should be closed and that the developments in the area should be phased out. This is an important recreation area. The facilities at the Gila Cliff Dwellings National Monument provides a unique opportunity to provide the public with information about early human occupants of the area.

2-2

We do not feel that the areas that you propose should be classified as wilderness. There is approximately 790,000 acres of existing wilderness on the Forest. The existing wilderness contains examples of most of the vegetative communities included within the areas that you recommend be classified wilderness. The existing wilderness also has the capacity to satisfy projected future wilderness recreation demand. We do agree, however, that some portions of the Forest should be managed to maintain their semi-primitive recreation opportunities. By doing so, future options to allocate more wilderness or to increase resource outputs can be addressed during the next plan revision. The Proposed Action Alternative results only in development of approximately three percent of the existing unroaded acres on the Forest. The following list identifies all of the presently unroaded areas on the Forest and the acres projected to be affected by development activities.

AREA	TOTAL AC.	AC. EFFECTED
Gila Wilderness Additions	73,515	1,050
Aldo Leopold Wilderness Additions	96,055	0
Blue Range Wilderness Additions	10,795	0
Nolan	11,630	0
Mother Hubbard	6,090	0
The Hub	7,770	0
Brushy Springs	5,790	0
Apache Mountain	14,305	0
Frisco Box	40,050	1,950
Brushy Mountain	7,890	0
Aspen Mountain	19,510	1,907
Wagon Tongue	11,560	4,000
Eagle Peak	27,180	7,105
Devil's Creek	89,595	2,500
Gila Box	24,350	0
Elk Mountain	4,475	0
T Bar	6,980	0
Canyon Creek	9,235	1,950
Taylor Creek	6,130	0
Stone Canyon	7,340	0
Wahoo Mountain	22,080	0
Poverty Creek	10,280	0
Largo	13,110	0
Sawyer's Peak	64,200	0
Meadow Creek	35,140	140
Hell's Hole	18,860	0
Lower San Francisco River	25,560	0
Dry Creek	29,560	0
	699,015	20,602

NOTE: Any differences between these acres and the original RARE II acres are a result of classification changes caused by the New Mexico Wilderness Act or because unroaded areas have been developed since 1980.

LETTER 2

3 There should be no new road construction on the Gila National Forest, roads in the proposed Wilderness Areas should be closed and reclaimed, and all vehicles should be restricted to designated, constructed roads on the Forest] 3

FOREST SERVICE RESPONSE TO LETTER 2

2-3

Some additional road construction is necessary to address some of the Forest issues (particularly the timber issue).

As a result of concerns regarding the level of timber harvest on the Forest, the projected harvest level has been reduced. The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been revised and the modified Proposed Action Alternative proposes an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 14 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

Along with the reduced timber outputs the projected road construction miles would change significantly. The original Proposed Action Alternative projected the construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads over the same period. This is a projected 57 percent reduction over 50 years. Approximately 65 percent of the local roads constructed as a result of timber activities and not needed for administrative purposes would be closed.

You also had a concern regarding ORV use on the Forest. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require additional closures, specific areas will be closed or restricted to ORV use.

LETTER 2

- 4 No old growth or previously unlogged forest should be cut There should be no deficit timber sales, 4
- 5 The grizzly bear and Mexican wolf should be reintroduced into Gila/Aldo Leopold Wilderness and possibly the other large Wilderness Areas The river otter should be reintroduced to the Gila and San Francisco Rivers Bighorn and pronghorn populations should be encouraged and expanded Studies should be made of possible reintroduction of the jaguar, ocelot, jaguarundi 5
- 6 Livestock grazing on the Gila National Forest should be phased out over the next decade. 6

P.O. Box 5871 Tucson Arizona • 85703 • 602-622-1371

FOREST SERVICE RESPONSE TO LETTER 2

2-4

Even though the modified Proposed Action Alternative projects logging less old growth (12 percent of existing in 50 years rather than 24 percent in 50 years) than the original Proposed Action Alternative, the harvest of some of these areas are necessary to meet the objectives of the alternative and to resolve the timber issue.

You also had a concern regarding return on timber investments. Maximizing monetary profit is not the primary objective of National Forest management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for recreation and fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sales of timber in some areas, for example, are designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the sum of the benefits to be considered to accurately evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

2-5

There has been a study conducted on the Forest to evaluate the potential of reintroducing the Grizzly Bear. The conclusion was that populations of the subspecies of grizzly (the Mexican grizzly) that occupied this area were not adequate to transplant and that fire protection over time has made the habitat less than ideal.

Reintroduction of the other species you mention was not recognized as a major public issue during the issue identification phase of the plan. As a result wildlife funding in the plan was used to maintain or improve habitat for existing species and not to do the detailed studies necessary to evaluate the feasibility of species reintroduction. The plan does not preclude reintroduction of these species. If funding becomes available to do the necessary studies, reintroduction would be considered.

2-6

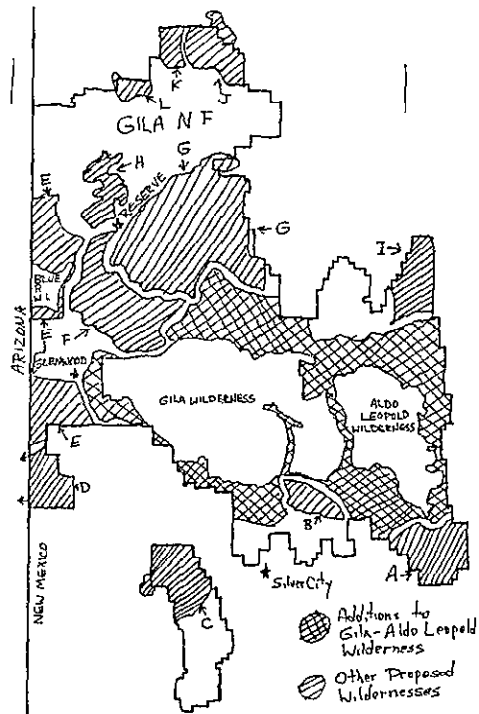
We disagree that livestock should be phased out over the first decade. Livestock use is a legitimate use of the National Forest. Since the creation of the National Forest System, significant progress has been made to improve the productivity of rangelands on the Forest. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

LETTER 2

- 7 The entire Gila National Forest should be withdrawn from appropriation under the Mining Law and Mineral Leasing Laws 7
- 8 All trapping and any form of predator control should be prohibited on the Gila National Forest 8
- 9 There should be no use of pesticides, herbicides, fungicides or other poisons on the Forest 9
- 10 Management concentration on the Gila National Forest should be on reforestation, rehabilitation of overgrazed areas, watershed repair, erosion control, closure of roads, protection and restoration of natural wildlife habitat, and other healing activities, using native species only 10
- 11 The entire Gila National Forest should be returned to a natural fire regime 11

Happy Trails

Dave Foreman
for Earth First!



FOREST SERVICE RESPONSE TO LETTER 2

2-7

The mineral laws indicate that mineral exploration and development are a legitimate use of federal lands. These lands should not be withdrawn unless there are compelling resource protection or conflict reasons. You have not provided any compelling reasons to recommend the entire National Forest be withdrawn.

2-8

The Forest Service is not responsible for predator control on the Forest. The U.S. Department of Agriculture's Animal and Plant Health Inspection Service, Division of Animal Damage Control (ADC) cooperates with the New Mexico Department of Agriculture in a program of animal damage control. We cooperate with this agency and will comment on projects on a case by case basis.

2-9

We do not agree. We employ several methods for controlling forest pests. Treatments are accomplished through cultural, biological, and chemical means. Each specific disease or pest outbreak is evaluated through a site specific environmental analysis. The method of treatment is selected based on many factors including: cost effectiveness, management objectives, and risk of environmental damage. More information on this forest management activity can be found on page 123 of the draft Environmental Impact Statement.

2-10

We agree that these type of environmental considerations are important and feel that we have given them high emphasis in the Proposed Action Alternative.

2-11

We agree that fire should be allowed to perform a more natural role in the environment than it has in the past. Because of the fuel load that has accumulated on the Forest, it will require a gradual transition to get the Forest in a condition where this is possible. We will continue to work in that direction.

LETTER 3

Fritz G. Popper
And
John L. Cassert
Hilda P. Cassert

9517 Waverly
El Paso, Texas 79924
(915) 544-7502

7 Oct 85

GILA NATIONAL FOREST
Silver City, N.M.

OCT 15 '85

DATE RECEIVED

re Forest Draft Plan
& Environmental
Impact Statement
Review process

Dear Sir -

We are concerned!

We feel that the Gila Nat'l Forest
should be protected for our
children and future generation
Logging and roadbuilding
should be severely restricted
Wilderness and Wildlife should
be protected and not given
up because of shortsighted

FOREST SERVICE RESPONSE TO LETTER 3

3-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 48 MMBF in the fifth decade. The revised Plan projects timber harvest at 30 MMBF per year during the first decade. This amount is projected to remain at approximately the 30 MMBF level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54 MMBF. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads, a 57 percent reduction in projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information concerning changes made to modified Proposed Action Alternative.

economic advantages.

Please, consider that. We
have all a responsibility
to preserve those things
that are irreplaceable,
once lost.

Be considerate.

Sincerely

Hilda Casut,

LETTER 4

FOREST SERVICE RESPONSE TO LETTER 4

Dear Sirs:

I recently supported the ⁰⁰⁰⁰⁰⁴Earth First!
alternative for the John Day National Forest. The
forests seem to know and understand that area
I've only visited briefly in that area but
truly understand the beauty of it all.

Since the John Day is a national forest truly
protected and designated wilderness we need to be
careful as to the use of possible abuse. The
Earth First! proposal is complex but comprehensive
they've taken it around every factor. Please
respond favorably to their initiative.

Thank you for your care and concern
about this issue.

Sincerely,
Mike Rand
c/o Gordon
1700 S. Cotton Drive
Hunting, Ar. 96001

U.S. FOREST SERVICE
John Day National Forest

OCT 15 1985

DATE RECEIVED

4-1

Please see our response to letter number 2, the Earth First comment
containing their suggested alternative.

LETTER 5

000005

October 4, 1975

Comments received from

Robert A. Lundy
Box 46
Mimbres, NM 87600

1. Continue the concept of multiple use management into the future. There appear to be more selective logging techniques in favor of others, ie. unevenage and selective logging in favor of commodity producing uses.
2. Provide the use of selective logging techniques on the Mimbres District.
3. Fuelwood gathering should be allowed year around. Also open up selected areas of invading pinon and juniper to fuelwood gathering. Many Mimbres residents would like to see the type of fuelwood in areas within close proximity to the Mimbres Valley.
4. Fuelwood gathering should be allowed year around. Also open up selected areas of invading pinon and juniper to fuelwood gathering. Many Mimbres residents would like to see the type of fuelwood in areas within close proximity to the Mimbres Valley.
5. In an effort to reduce river siltation, more upper stream dams should be constructed. This would also benefit the fisheries and wildlife as well as the domestic livestock.
6. Keep existing roads open and provide others to improve access to the Forest for the type of Forest use.
7. Provide information to the public regarding the use of herbicides on the Forest.

FOREST SERVICE RESPONSE TO LETTER 5

5-1

We will continue to manage under the multiple use management concept into the future. There have been some changes in the Proposed Action Alternative that we feel provide for more balanced use of the Forest resources. These include a reduction in the timber allowable sale quantity, a reduction in the miles of roads that would be constructed and an increase in trail maintenance. A more complete summary of these changes can be found in the beginning of the comment book.

5-2

There is one commercial timber sale activity planned on the Mimbres District in the first decade. Selective logging (unevenage management) techniques will be used if needed to maintain wildlife habitat.

5-3

We disagree that fuelwood gathering should be allowed year around. The fuelwood season was established to reduce wet season damage to Forest soils and roads. The seasonal approach also provides for concentrated administration of fuelwood activities which increases the cost effectiveness of fuelwood management. The result is better management of National Forest resources.

Opening up of selected areas of invading pinon and juniper to fuelwood gathering is the way green fuelwood is managed on the Mimbres District. New areas are not opened, however, until the management objectives are satisfied on existing open areas. This may mean that undesirable species or small diameter trees may require harvesting before other areas are opened. Fuelwood is managed on a sustained yield basis; therefore, only a limited amount of area can be harvested each year.

5-4

We agree that this is a problem. We will continue to try to educate people to not litter.

5-5

No major upper stream dams are planned. These type of projects require water rights and water rights are limited and expensive to acquire.

5-6

We will continue to work toward providing improved access to the Forest.

5-7

When herbicide projects are planned, public involvement is included in the environmental analysis process. The amount of public involvement and the number of people contacted depends on the magnitude of the problem.

LETTER 6

FOREST SERVICE RESPONSE TO LETTER 6



Southwest Forest Industries
TIMBER RESOURCES DIVISION

000006

P.O. Box 706
Eagar, Arizona 85925
Telephone (602) 333-2661

October 4, 1985

Mr. Kenneth Scoggins
Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, NM 88061

Mr. Scoggins,
Dear Mr. Scoggins,

This letter is in response to the Forest's request for comments on the Gila National Forest's Draft Environmental Impact Statement (DEIS) and Proposed Gila National Forest Plan (Draft Plan). In regard to these documents, Southwest Forest Industries offers the following:

Southwest Forest Industries is an integrated forest products company involved in the manufacture and distribution of paper, packaging and building products. Although Southwest has operations based in fifteen states, our sawmills in Reserve, New Mexico and Eagar, Arizona along with our papermill in Snowflake, Arizona should be of utmost importance in the management of the timber resource on the Gila National Forest. The Reserve mill is sole source of raw material as the Gila National Forest, while our Arizona mills presently utilize timber from the Gila and the National Forests of Northern Arizona. Moreover, these mills provide a stable and dependent economic base for the towns in proximity to these mills. In particular, the village of Reserve and surrounding populace depend heavily on the Reserve sawmill as a source of employment. Approximately 40% of the local employable populace depends on the sawmill, logging or timber related support businesses for employment. Therefore, Southwest is keenly interested in the resource production opportunities in particularly the future timber supply, the Gila National Forest has recognized and proposes under its DEIS and Draft Plan.

In general, Southwest's review of the Gila National Forest's DEIS and Draft Plan indicates the documents are well-organized and written. The DEIS is a reasonably well-prepared document that will serve as the means for the public, as well as Forest Service managers to analyze the various resource production options available on the Gila National Forest. Although Southwest fully supports the Proposed Plan, specific topics exist which require further elaboration. The following are Southwest's comments on specific elements of the DEIS and Draft Plan that should be more intensively addressed in the Final Environmental Impact Statement (FEIS) and Final Plan.

LETTER 6

FOREST SERVICE RESPONSE TO LETTER 6

Southwest would like to take this opportunity to commend the Forest on the preparation of Section 4 - Environmental Consequences. This section is concise and well-organized. This section does a fine job of providing an analytic basis for comparison of the various Alternatives.

The overall discussion presented in Sections Two and Three of the DEIS generally is good, but several inconsistencies and unclear statements need clarification. The following section by section analysis will explain our concerns.

1. Section 2 - Alternatives Including Proposed Action

Alternative D, the Timber Emphasis Alternative, producing higher timber outputs than the other alternatives, presents relative reductions in wildlife forage and herbaceous cover. This reduction is displayed in Table - "Per Cent Change in Existing Habitats Expected by the End of Fifth Period", on Page 34 of the DEIS. Higher timber resource outputs (sawtimber and fuelwood harvest) will promote substantial increases in forage and herbaceous cover. These increases are a result of reductions in canopy cover associated with timber and fuelwood harvest. These increases might be consumed by cattle if permitted livestock numbers increased substantially in Alternative D relative to the other Alternatives. This is not the case, so increases in forage should be available to wildlife. Southwest feels some re-analysis should be implemented or explanation offered as to why forage and herbaceous cover suffer a large decrease in Alternative D and why Alternative F with low timber outputs incurs a drastic increase in forage and herbaceous cover. The paradox of wildlife habitat not benefiting from timber management also appears in the graphic display of outputs in Appendix C where Alternative F produces low timber outputs coupled with high Wildlife RVD outputs. While the other Alternatives, particularly PA and D produce higher timber outputs coupled with reduced Wildlife RVD outputs. In addition, Alternative PA has higher timber outputs than Alternative D in Periods 3, 4, and 5, but PA produces higher Wildlife RVD outputs than D in these same periods. Either wildlife benefits from increased timber outputs or it does not and the DEIS should be able to clearly establish when and why such benefits do or do not occur. The blanket statement on Page 34 "the level of coordination and improvement associated with quality habitat can offset the overall effect on wildlife carrying capacity", must be expanded on for each Alternative to explain how level of coordination and improvement of quality habitat offsets potential reductions in wildlife carrying capacity.

6-1

We agree that on the surface the results of Alternative D look somewhat counter intuitive. We have reexamined our assumptions and believe that the results are correct. The objective of Alternative D was to manage for a high level of sawtimber. Wildlife and grazing outputs were de-emphasized.

The increased timber harvest, while opening up stands as you suggest, also increased the proportion of stands in early successional stages reducing overall habitat diversity. Additional forage would be beneficial to big game species. However, the nongame species would be adversely affected by the diversity changes. Also, both range and wildlife funding are reduced in Alternative D. No new habitat improvements would be scheduled and many existing improvements would not be maintained, thus minimizing their effectiveness. The net result is that much of the created forage would go unutilized because other habitat components, specifically hiding cover and water, would not be available.

On the other hand, Alternative F does not open up as much timbered area, yet it maintains a better mix of habitat components. Also, grazing is reduced substantially and a high level of wildlife habitat improvements are made. The net result is substantial increases in habitat carrying capacity.

We believe that the results are accurate when all the contributing factors are considered. We feel that the discussion on page 35 of the DEIS describes the situation.

In addition, if Alternatives C and D are Commodity Emphasis Alternatives, then they should maximize PNW of commodity resources. Recreation, by definition, is a commodity resource. This resource yields more benefits per dollar invested than any other resource. With this in mind, it is hard to justify why Alternatives C and D contain a budgetary constraint for Developed Recreation as stated on Pages 22 and 24 of the DEIS. This constraint, an assumed funding limitation, allows some developed sites to deteriorate and close in the Second Period. With increased demand for recreation as portrayed in future trends for Recreation on Page 65, there should be adequate funding to prevent site deterioration. Additional explanation is necessary, so the reader can determine the reason for the assumed funding limitation in these Alternatives. If the funding limitation is realistic, then an analysis should be undertaken to determine the effect of shifting existing sites from non-fee to fee area classification.

On Page 25 of the DEIS under Socioeconomic Section of Alternative D, the statement is made that Wildlife Recreation will suffer a substantial decrease while timber production increases. The logic behind this statement is unclear and Southwest feels some additional explanation is necessary. If increased timber outputs are coupled with a sound wildlife habitat maintenance program and a reasonable timber site road closure program, then Wildlife Recreation RWD's should not undergo a substantial decrease.

On Page 25 of the DEIS, under the Socioeconomic Section of Alternative F, annual receipts for this Alternative in the first decade are placed at \$50 million. On Page 49 in Table 11 - Resource Benefits by Alternatives and Benchmarks, the annual receipts for Alternative F in the first decade are placed at only \$5 million. This inconsistency must be rectified.

In Table 5 - Acres of Timber Harvest Methods on Page 40 of the DEIS no salvage harvest acreages are included for any of the Alternatives. The Proposed Action Alternatives call for thousands of acres (12,000+) of salvage harvest in Periods 1 and 2. Salvage harvests may or may not be included for these unsuitable timberlands in other Alternatives, but there is no definite indication either way in the DEIS. Southwest feels salvage harvest acreages should be included in Table 5 of the DEIS.

Furthermore, Southwest contends that timberlands deemed unsuitable due to capability or physical factors should be managed more intensively than on a salvage basis. Large acreages of these unsuitable timberlands have apparent artificial regeneration problems, but they have regenerated in the past and will continue to do so in the future when conditions are favorable. Prescribed burning in this type of area will increase the probability of successful natural regeneration.

6-2

We disagree. The effects of maximizing PNW without constraints was tested in the Maximum PNW Benchmark and we do not believe any additional analysis is required. The objectives of Alternatives C and D were to manage for a high level of grazing and a high level of timber respectively, within a realistic overall budget level. No constraints were placed on recreation specifically. However, once the share of the total budget required to maximize grazing and timber was obligated, there was not enough money left to increase recreation.

6-3

The response to this comment is the same as that for comment 1.

6-4

The receipts shown on page 49 are average annual figures and those shown in the descriptions of the alternatives are decade totals and should be ten times the figures on page 49. Although confusing, the figures are correct.

6-5

We agree. Estimated salvage acreage has been added to the Table in the final Environmental Impact Statement.

6-6

We disagree. The National Forest Management Act precludes intensive timber management on unsuitable areas; however, unsuitable timberlands are managed. An integrated multiple-use prescription has been assigned to every acre on the Forest. While unsuitable timberlands are not subject to intensive silvicultural practices, some are salvage logged, fuelwood harvested, and burned as you have suggested.

LETTER 6

Southwest appreciated the opportunity to visit some of these unsuitable areas with Forest Service personnel early in the planning process. At that point in time we agreed in principle with the management proposal for these unsuitable areas. Unfortunately, the management proposal was not included in the DLIS. Southwest feels the Forest should undertake an analysis utilizing an uneven aged management scheme on timberland classed as unsuitable due to regeneration problems. We realize the computer models (RM YIELD and SAIL) used to simulate management practices and potential yield do not provide a true picture for uneven aged management. But some effort should be put into developing other computer models or adding to RM YIELD so that uneven aged management prescriptions are available for use on unsuitable timberlands and suitable land classed as not suitable due to uneven aged management due to wildlife habitat constraints.

In suitable land areas, unsuitable timber acres not available are not displayed on the Forest Management Area Index Map. The criterion should be displayed on the map and the composition legend should include definitions as to whether displayed area are 1) Forest land not available due to administrative withdrawals, or 2) unsuitable forest land.

2. Section 3 - Altered Environment

On Page 72 of the DLIS under the Timber and Fuelwood-Timber Suitability Section, the discussion of the sequential steps that were followed in determining lands tentatively suitable for timber production concerns Southwest. Our concern is that on a long-term basis the analysis method will not allow for increases in the suitable timber land-base in areas where commercial timber species are advancing into grasslands and meadows. This analysis method precludes inclusion of any acreages that are presently inhibited by young stands of regeneration on the periphery of grasslands. These acreages should be included as suitable timber acres.

In addition, the Management Emphasis for some Management Areas in the Draft Plan call for preventing coniferous invasion of grasslands. Southwest condones this as an acceptable practice in areas where Pinon and Juniper are the invading species but not in areas where the invading species is a commercial timber species. The invasion of grasslands by timber species is a naturally occurring successional stage that increases the acreages of suitable timber over an extended period of time. Southwest contend management of the timber resource yields a higher benefit per dollar invested than the range resource and therefore the succession of grasslands and meadows to timberland should continue without management intervention.

FOREST SERVICE RESPONSE TO LETTER 6

6-7

We agree that more refined growth and yield models may be beneficial. This research need was recognized in the analysis of the current management situation. However, we believe that our results are accurate and that salvage logging on some unsuitable timber lands is adequate treatment. Your comment implies that every timbered acre should be subject to silvicultural treatment. It seems illogical to design uneven age management systems to harvest unsuitable timber land when only 61 percent of the tentatively suitable timber land requires management to achieve the objectives of the Forest Plan.

6-8

It is not possible to include this type of detail on the 1/2 inch to the mile Forest planning maps. The suitability information (acres) have been included for each management area. In addition, the harvest table in the standards and guidelines (E06) has been modified to provide additional information on the percentage of the Logical Timber Management Areas that are not appropriate for timber management in the plan.

6-9

We disagree. We followed the procedures outlined in 36 CFR 219. As pointed out in Comment 7, only 61 percent of the tentatively suitable timber land is needed to achieve the objectives in the Forest Plan. The amount of fringe area around meadows you describe would not be significant and would have no bearing on the final suitable land area for the Forest Plan. The areas you mentioned in addition to other unsuitable timber land will be re-evaluated when a new plan is done in 10-15 years. If the character of these areas or the economic situation has changed, some of these acres could be added to the suitable timber base.

6-10

We disagree. Again these areas are marginal and have not been included in the tentatively suitable base. As previously pointed out, they are not needed to meet timber production objectives in the Forest Plan.

the explanation and information provided in the DEIS regarding the economic

analysis is not always clear nor accurately stated. Of particular concern is the absence of adequate explanation of various benefits accrued to one resource as a result of managing another resource (e.g., road construction for timber management resulting in increased dispersed recreation benefit or timber harvest increasing vegetative diversity and thereby providing benefit to the wildlife resource). The cost implications are just as important as the benefits. Since resources such as timber incur the cost but the allocation of benefit in determining present net values is not always returned to the timber side of the ledger. Southwest feels unreasonable statements are made in this regard on Pages 51 and 52 of the DEIS. The statements "The variation in range is the result of the increased cost of implementing market output versus the cost of implementing quantity or non-market outputs. There are, for example, fewer costs associated with managing wildlife and dispersed recreation than there are for the management of timber and range programs", exemplify the above discussion. Range and timber resources bear many of the costs that provide increased benefits on the wildlife and dispersed recreation side of the ledger, thereby reducing the physical cost of managing wildlife and recreation resources. Southwest suggests that the Forest address the cost-benefit trade-offs between resources in an in-depth manner in the DEIS.

Southwest does not agree that the timber values used in the DEIS are appropriate and certainly do not reflect a "willingness to pay" similar to other values used in the analysis. National Forest timber is normally sold in a highly competitive market where few substitute goods exist, thus explaining the analyst's logic. In the past few years, however, Gila National Forest timber has been sold at its base advertised rate under a deficit situation. These sale conditions are further complicated by a small business set-aside program which affords small businesses an unfair advantage to sometimes buy timber at a lower than market price (reduced or no competition). Given these conditions, it would be unfair and ill-advised to say that timber sale receipts accurately reflect a true "willingness to pay" value. In order for the Forest to value timber on an even basis with other resources it would be beneficial to: 1) explain the relationship of deficit value and base rate or bid value -- the marginal difference added to the bid value may better explain a willingness to pay value when competition occurs; 2) the effect the SBA set-aside program has on competition and price; 3) explain the effect that other competition factors have on timber bid prices received by the Gila National Forest. None of the above noted problems or effects are explained in the DEIS. Thus, it is Southwest's view that timber benefit values are understated in the analysis.

6-11

Southwest Forest Industries has stated that the economic analysis shown in the Draft Environmental Impact Statement is often unclear and inaccurate. The primary concern appears to be that labeled "timber costs" and "timber benefits" do not fully reflect the "true" timber costs and benefits. Southwest correctly points out that the timber program embodies both "joint costs" and "joint benefits." For example, the labeled "timber costs" include costs which may result in producing or enhancing other resources and outputs such as wildlife habitat or mitigation of insect and disease problems. We agree with your observation that the timber and range budget categories bear many of the costs that provide increased priced and non-priced benefits for other resources on the Forest. However, at the present time, the Forest Service is unable to define an acceptable procedure to allocate all of these "joint" costs and benefits. Several efforts are underway both in the research area and at the national level with Congress and the Government Accounting Office to attempt to remedy this problem. In an effort to clarify this information, the joint production situation has been explained to many of the respondents that spoke to specific resource costs and benefits. See, for example, Forest Service response to Sierra Club, comment number 9 and to the New Mexico Natural Resources Department, comment number 30.

6-12

We do not agree with the Southwest view that timber benefit values are understated. Timber benefit values that were used for the Draft Statement were, in fact, overstated. The values have been revised downward and the revised analysis reflects this. These and other changes in the Proposed Action timber program are detailed in the Proposed Action Changes Summary at the beginning of this document.

In our judgement, timber benefit values do reflect a similar approach to other benefits used in the analysis. The benefit values for timber are not based on the operator's expenditures, just as the recreation benefit values are not based on the recreationist's expenditures (both of which may be substantial). Timber benefit values are based upon the actual bid prices (plus purchaser credit) received for Gila sales between 1978 and 1982. We did not use the prices received for 1983 or 1984 because we do not believe these market lows will continue for the next ten years. In other words, we do not believe that the last year or two years experience will be representative of the next 10 years.

Your observation that many recent timber sales have sold for minimum bids is correct. Our review of the recent history of the small-business set-aside program indicates that this program has had little effect on bid prices received. As is the case with other timber markets in the southwest, Gila market conditions react strongly to outside factors such as the general state of the U.S. economy. The lower prices received recently for Gila timber are not unique to this Forest. Prices nation-wide have declined as well. Our future expectations are that timber bid prices will continue to behave much as they have in the past. In periods of general economic advances, more timber will be sold at higher prices; and in periods of decline, less volume will be sold at lower prices. This has been the trend in the past 10-15 years and we expect this situation to continue. For the most part, factors beyond the control of the Forest will determine bid prices.

LETTER 6

FOREST SERVICE RESPONSE TO LETTER 6

3 Draft Plan

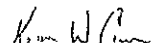
In regard to the Draft Plan, Southwest considers as critical the necessity of completing timber inventory (stand examinations) on 100% of the forested land on the Gila National Forest. At present, only one-half or 216,180 acres of the 432,361 acres of suitable timberland have received stand examinations. An intensive effort should be made to complete stand examinations on the remaining 216,181 acres of suitable timberlands and on capable, unsuitable timberlands prior to the end of the First Planning Period. In this manner, more accurate Forest-wide timber inventory information would be available at the onset of the next planning effort. Furthermore, Southwest would like to see an addition to the Monitoring Plan that will ensure completion of stand examinations, as described above, prior to 1995.

The planning process provides an excellent opportunity for the Forest to address the need for increased cost efficiency in the management of all resources. Specifically, Southwest feels the Forest should address the need for a continued trend toward cost efficiency in management of the timber resource. Cost efficiency in managing the timber resource should be of utmost importance because improved cost efficiency will minimize or eliminate the possibility of timber sales being sold below the cost incurred to prepare, administer and complete post-sale work on timber sale areas.

In conclusion, Southwest realizes completion of the planning process to this point has been a tedious task and we would like to commend the Gila National Forest on the DEIS and Draft Plan. Southwest appreciates the opportunity to have been a

participant in the planning process thus far and looks forward to a continued good working relationship with the Forest in the future. If I can answer any questions regarding these comments, please contact me at our Reserve, New Mexico Office (505/533-6331).

Sincerely,
Southwest Forest Industries


Kevin W. Cain

6-13

We agree that an intensive effort is necessary to complete stand examinations. We feel, however, that your concern has been addressed in the draft Plan. On page 37 of the draft Plan, a standard and guideline is included that states that "Compartment examination could be completed on the Forest by the end of the first decade".

No monitoring activity related to completion of compartment examinations was included in the draft Plan. As a result of your request we have added a activity relating to the monitoring of compartment examination accomplishment.

6-14

We share your view that the planning process should be used to help promote management efficiency on the Forest. We believe the analysis carried out thus far for the Forest Plan has contributed greatly to this objective.

LETTER 7

RUSS W BAKER
PO Box 460
Magdalena NM 87825-0460

000007

October 8 1985

Gila National Forest
2610 Silver
Silver City NM

PA 10/10/85

OCT 10 '85

DATE 10/10/85

Dear Forest Supervisor

I urge you to go ahead with the Proposed Alternative plan for the Gila. All of the questions I have are covered in detail in the Plan, so I can only offer an opinion.

The areas along State 78 and Rocky Canyon appear to need more attention to erosion control and what looks like overgrazing, but will be adequately dealt with under PA.

Thank you for the opportunity to be a part of the National Forest planning.

Yours very truly,

Russ W Baker
Russ W Baker

FOREST SERVICE RESPONSE TO LETTER 7

7-1

Thank you for your comment.

LETTER 8

FOREST SERVICE RESPONSE TO LETTER 8

000000

U.S. Forest Service
New Mexico Area 3C
Comprehensive Management

Box 5, 1785

Introduction

For reviewing the New Mexico Forest Service
forest plan, it is in the interest of the
public to know the management strategy and how
it will be implemented. The plan is the result
of a process that has been going on for some
time. It is a major part of the plan to
manage the resources of the forest. The plan
should be a guide for the management of the
forest. The plan should be a guide for the
management of the forest. The plan should be
a guide for the management of the forest.

It is the policy of the Forest Service to
manage the forest in a way that will
balance the needs of the forest and the
needs of the public.

8-1

Forest administration is the result of several years of coordination and cooperation between land users, state agency, and the Forest Service. It takes input from all sides to balance the scales and produce a forest plan that will help guide future management decisions. The New Mexico Game and Fish Department was contacted by the Forest on the plan development. The goals outlined in the State Comprehensive Plan were used as a guide to help provide the Forest with a management strategy. The goals of the New Mexico Game and Fish Department could not met in all situations, and still provide a suitable balance of all resources.

8-2

We agree. Elk were not included in the management emphasis in area 3C yet, they are present. The Plan now includes elk in the emphasis statement and the area description.

8-3

Wildlife numbers estimated in 1980 were verified in 1985 as a result of our public meeting input. Permittees requested the wildlife numbers be re-evaluated within each management area. The numbers shown in the Plan represent our best effort to accurately determine wildlife numbers. The 1985 population estimates include input from permittees, New Mexico Game and Fish Department, and Forest Service personnel.

E-4

The goals set forth in the State Comprehensive Plan (wildlife section) provides the wildlife species emphasis. The Forest Service will be working closely with the State Game and Fish Department to maintain adequate habitat for the wildlife resource.

As of now the fish and game dept is not contributing any habitat improvement or maintaining the habitat, nor wildlife. We also feel that the fish and game dept are not as concerned about the management of the wildlife as they are in buying habitat into their treasury.

In management Plan 32 page 111 it states that grazing allotment will generally be managed to meet the needs of the livestock owner and as a management project and under the direction of the livestock owner. We feel that management Plan 32 above the B level, has set that at a level of management to a C level if that is best. We feel that we have a good grazing situation, we have good range, and we have good habitat. We feel that it should be maintained at a B level.

We are dependent on the Benthos Allotment for the wildlife range management. We feel that as to the water development in spring or water programs we would be willing to take on a donation and on labor.

In our management plan we feel that the livestock owner could be put directly to produce more products in the livestock allotment and we are willing to help with the B level following forestry guidelines.

8-5

Habitat improvement for wildlife can come from several sources; one is the direct contribution of funds to support habitat; another is the coordination of activities such as timber harvest, road locations, etc. The New Mexico Game and Fish Department has in the past, provided both direct habitat improvement and coordination support to the Forest.

8-6

During the analysis of the Forest range resource, we determined that the cost to sustain existing grazing levels and levels projected in all existing allotment management plans was greater than the funds available. For this reason, each management area was analyzed and a management level was set that would provide the maximum domestic AUMs from the entire Forest—with the available funds. When considering these funding limitations, the management area containing your allotment was projected to be managed at a level B. We agree that there may be opportunities to sustain a higher level on some individual allotments. For this reason we have reworded the standards and guidelines to indicate that the level shown in the Plan is the minimum level of management. Higher levels of management may be possible on individual allotments if additional funding becomes available or through permittee funding. Higher levels of management, however, could only be implemented if other multiple use objectives for the area would be met.

8-7

Range improvement, as in the past, will continue to be a cooperative effort between the permittee and the Forest Service.

8-8

Your willingness to cooperate on needed range improvements is very much appreciated. The balance of fuelwood and gross production on individual areas will however, be implemented on a project by project basis as directed by the emphasis in the Forest Plan.

It is noted in the plan that "had no consideration for weather which is perhaps the largest factor in land management. This should be taken into consideration as well as your range land estimate."

There has to be management of our natural resources in the wilderness. If the plan is to manage our natural resources for the next forty years, it should be based on fact, not fantasy. It also has to have solid commitments from all parties involved. The only way you can do this is to have a common understanding of the intent and the implications involved.

Sincerely,
Richard D. [illegible] [illegible]

P.S. when writing, just keep please write it in a way that the person who may understand our intention.

8-9

Weather conditions do play an important role in wildland management. In as much as we have no control over the weather we must assume it will remain similar to the past and our management decisions would be equally affected.

8-10

We agree that there needs to be management of our natural resources and the decisions must be based on our best knowledge. The Forest Plan is however, only a 10 year plan with some long term projections to enable the management team to analyze future impacts. We also agree that the Plan should build commitment and confidence and provide a common understanding of the identified goals and objectives. For this reason the Forest has conducted workshops and public meetings to help provide a better understanding of the intent and the implications involved.

LETTER 9

000009

5620 E. Hawthorne
Tucson, AZ 85711
October 7, 1985

400 100 100 100
Silver City, New Mexico

011085

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir:

I would like to say that I think the draft management plan for the Gila National Forest is a blueprint for disaster.

I oppose the increases in timber harvest and road construction. I think that our remaining natural areas should be kept without roads. Timbering and road increases are uneconomic, damaging to other forest uses, unsightly and destructive of remaining wildlands. 1

I do support wilderness designations for the lower San Francisco Canyon and Hells Hole. 2

I believe that areas along the Mogollon Rim, the Frisco Box and Eagle Peak and areas next to Aldo Leopold Wilderness should remain roadless and undeveloped for semi-primitive and non-motorized recreation. 3

I grew up in Silver City. I have had many wonderful wilderness experiences on foot and horseback. It is wonderful to be out and see undisturbed wildlands and all kinds of plant and animal life. It is depressing to see roads in areas which used to be so beautiful.

We need to protect these areas for their value for ecological study, recreation, wildlife, plant life and watershed protection.

Please help protect the Southwest's remaining wildlands.

Sincerely,

Virginia Robertson

Virginia Robertson

FOREST SERVICE RESPONSE TO LETTER 9

9-1

The original Proposed Action Alternative would have resulted in the saw-timber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. As a result of the comments received, demand projections and benefit values have been revised using more recent data. Please refer to the Proposed Action Change Summary at the beginning of this document.

9-2

We have reevaluated our recommendation on the two Wilderness Study Areas, but we still feel that a nonwilderness recommendation is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

9-3

Because of changes in the amount and location of timber harvest activities and changes made as a result of public concerns, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and available for semi-primitive type recreation. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the undeveloped areas on the Forest.

LETTER 10

FOREST SERVICE RESPONSE TO LETTER 10

006-10

September 27, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

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OCT 02 1985

CLARK

The comments provided are the same as those provided by the New Mexico Department of Agriculture with the State of New Mexico comments. Our responses are the same as those for Letter #1, State Department of Agriculture section.

Dear Mr. Scoggin

As concerned individuals and as representatives of the livestock industry in New Mexico, we have reviewed and analyzed the Gila National Forest Draft Environmental Impact Statement (DEIS) and Proposed National Forest Plan (PNFP). Our findings and conclusions concur with those reported by the New Mexico Department of Agriculture (NMDA) in "A Review and Analysis of the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan, Statutory Procedures and The Livestock Grazing Issue".

We have supported and will continue to support the proper management and conservation of New Mexico's forest rangelands. In our opinion, however, the Gila National Forest DEIS/PNFP documents present information and conclusions which cannot be substantiated and proposed actions which are inconsistent with the stewardship of our natural resources and which jeopardize the future of livestock grazing on the Gila National Forest.

Accordingly, we endorse and fully support the comments, observations, and conclusions presented by NMDA in their review document. That document (enclosed) and this letter represent the official comments of the undersigned organizations on the Gila National Forest DEIS/PNFP.

Sincerely,

Bud Eppers
R. W. "Bud" Eppers, President
New Mexico Public Lands Council

Bill McIlhenny
Bill McIlhenny, President
New Mexico Farm and Livestock
Bureau

Don Hoffman
Mr. Don Hoffman, President
New Mexico Cattle Growers

Mike Casabonne
Mr. Mike Casabonne, President
New Mexico Wool Growers

Art Tackman
Mr. Art Tackman, President
Gila Permittees Association

Enclosures NMMA comments

cc Regional Forester, Region 3, U.S. Forest Service

LETTER 11

LETTER 11



00011
EL PASO REGIONAL GROUP

September 30, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin,

Please find enclosed written comments on the PROPOSED GILA NATIONAL FOREST PLAN and DEIS. These comments and philosophies represent the position of the El Paso Regional Group of the Sierra Club, and the El Paso/Trans - Pecos Audubon Society, the Wilderness Society, and the El Paso Cactus and Rock Club regarding the future ecological stability of the Gila Forest and other related issues.

These comments are intended as positive input in a prescribed planning process as well as to provide the basis for our continuing participation in that planning process.

The Rio Grande Chapter of the Sierra Club in conjunction with the State of New Mexico has contracted Randal O'Toole of CHEC to supplement our analysis of the proposed plan and the DEIS. Mr. O'Toole's report is attached as a supplement and is to be considered a part of this report.

Our group would like to compliment the co-operation and positive attitude of Gerry Engel in not only being responsive, but showing initiative in facilitating our preparation of this response. He is to also be thanked for agreeing to come to El Paso and making a presentation at our general meeting regarding the forest and the planning process.

Our members are regular and frequent users of the Gila National Forest and are extremely interested in its future management.

The organization of the response will be in three parts:

- 1) a brief summary of our more important concerns,
- 2) the comments themselves organized by topic or specific area/issue, and
- 3) the O'Toole evaluation and comment.

DATE	TIME	FILE	BY
SEP	10:00	102E	AVS
SEP	11:00	102E	AVS
SEP	12:00	102E	AVS
SEP	13:00	102E	AVS
SEP	14:00	102E	AVS
SEP	15:00	102E	AVS
SEP	16:00	102E	AVS
SEP	17:00	102E	AVS
SEP	18:00	102E	AVS
SEP	19:00	102E	AVS
SEP	20:00	102E	AVS
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SEP	22:00	102E	AVS
SEP	23:00	102E	AVS
SEP	24:00	102E	AVS

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SUMMARY OF IMPORTANT CONCERNS

#1 Emphasis seems to be on short term timber harvest goals rather than on overall general long term goals.

#2 We believe Alternative F should have been the preferred alternative. It is not only more environmentally sound, but your DEIS also indicates that it is more economically sound.

#3 The two WSAs should have been recommended for full wilderness status and other additional roadless areas should have been considered for future wilderness.

#4 Doubling the fuel wood harvest in the second decade doesn't sound realistic. Is this purpose to, in effect, legitimize the present poaching of fuel wood within the forest?

#5 We believe the steep slope cable logging viability to be a myth, not only because of potential negative environmental impacts but also because the cost to industry for such techniques would be prohibitive.

#6 We question the repeated use of the term "careful management" or "increased management intensity" that is used so frequently in the plan believing "management," as it is used, to be a bureaucratic term without substance. In terms of the paucity of the base line data necessary, recovery rate data necessary, the necessity of a multitude of management plans necessary for each of the diverse subdivision habitats of the Gila, and the constraints of manpower/budget considerations. In essence, we believe all of the "careful managements" would necessitate the quadrupling of the Gila staff and budget, or it would mean in most cases that the forest would manage itself at the mercy of the Service's multiple use activities. An example to illustrate this point is a statement by Dr. William Reid, Chairman of the Biology Department at the University of Texas at El Paso that, "there is a dearth of data on the nature of soil recovery in the Southwest."

#7 Protection of non-game wildlife seems to be glossed in the plan.

#8 Mitigation for the present range degradation needs to be more specifically spelled out particularly since by your own admission existing range laws and policies are not presently being completely enforced.

(11)

To explore, enjoy, and protect the Nation's scenic resources

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

WILDERNESS

Wilderness resources are much more important than renewable resources such as timber and forage because they are irreplaceable. Once logged or roaded they are gone forever.

All of the roadless areas, not just the two identified WSA's, which qualify for inclusion in the National Wilderness Preservation System should be preserved and included in the system before they cease to exist. Public Law 96-550 (The New Mexico, Dec 19, 1980, Wilderness Bill) clearly states, "the Department of Agriculture shall not be required to review the wilderness option prior to the revision of the initial plans, and in no case prior to the date established by law for the completion of the initial planning cycle," and need not be managed for the purpose of protecting their suitability for wilderness designation. "We interpret this to mean that while you are not mandated to manage for potential wilderness that the law doesn't preclude the managing of potential areas for wilderness. There are many areas in the forest that deserve interim quasi wilderness management and the second planning cycle should have considerations for recommendation to Congress for full wilderness designation for appropriate areas. These precious roadless areas should not be allowed to "get away."

We believe there is an anti-wilderness bias in the plan and while certainly not a part of the plan we would like to quote Supervisor Skoggin as quoted in the June 30th issue of the ALBUQUERQUE JOURNAL in terms of his wilderness philosophy when he said, "The Frisco Canyon is unique and valuable, but I don't see a designated wilderness category as the best way to manage it. I don't believe vehicles have a lasting effect on riparian habitat. I feel very strongly that the public should have as much freedom for recreation in our national forest as possible. Except for wilderness, the forest is open to off-road vehicle use, we can always close an area off if anything is getting hurt." We find such an attitude inexcusable and not within the Service's mandate of maintaining the integrity of the forest in perpetuity.

In specific, we would like to protest the recommendation for nonwilderness uses of the Hell's Hole and Lower San Francisco areas. Hell's Hole, characterized by rugged canyons, rocky peaks, steep cliffs, and rolling hills, has retained its overall natural appearance. The Lower San Francisco Canyon is an example of lower riparian woodland with a diversity of plant and animal life. This is a fragile area and ORV use will intensify negative impacts. These areas should continue to be treated as wilderness and the process of formal wilderness status should be begun. By making this nonwilderness recommendation, you will have taken off the face of the earth, unnecessarily, two more of those rare, precious areas that are untrammeled by the hands of man and so necessary to the preservation of the viable biosphere of our planet. What is so precious in New Mexico scientifically, economically, culturally, and esthetically is not the short term pleasure/economic benefits of impacting a primitive area but rather the long term pleasure/economic benefits of a state possessing one of the few natural areas left on a rapidly dying planet.

In regards to the Lower San Francisco River, our position remains much the same as it was in the February 1980 appeal made by the Sierra Club Legal Defense Fund to the Region Three Forester that (1) The decision to allow continued ORV use of San Francisco Canyon is inconsistent with the Resource Protection Mandate of Executive Order 11644. (2) The decision to allow continued ORV use of the San Francisco Canyon does not ensure protection of cultural resources as required by law. (3) The Forest Supervisor based his decision on a legally inadequate and factually deficient environmental assessment report.

11-1

An inventory of undeveloped areas was conducted as a part of the RARE II process. The inventory was used for evaluating areas for potential inclusion in the wilderness system. Those areas selected by Congress for wilderness were classified as a result of the New Mexico Wilderness Act. The Act also required further study of some areas. There are two wilderness study areas on the Forest, the Lower San Francisco River and Hells Hole. The non-selected areas were released for multiple-use management.

In 1980, when the New Mexico Wilderness Act was passed, the Gila had approximately 753,195 acres of undeveloped area (not including Wilderness and Primitive Area). The New Mexico Wilderness Act designated approximately 39,275 undeveloped acres Wilderness and released approximately 5,705 acres that were previously classified as Primitive. Since 1980, 20,610 acres have been developed. This leaves approximately 699,015 acres of unroaded area on the Forest (including the two wilderness study areas). Chapter 4 of the Environmental Impact Statement has been amended to show the effects of all alternatives on the 699,015 acres of undeveloped area outside of classified Wildernesses. In the first decade the Proposed Alternative will result in the development of approximately 20,600 acres (3 percent) of the 699,000 undeveloped acres on the Forest. We agree that the New Mexico Wilderness Act does not prohibit the management of unroaded areas to maintain their wilderness characteristics. The areas not proposed for development as part of the planning process (including the Wilderness Study Areas) will be managed to maintain their semi-primitive recreation opportunities. Over 97 percent of the undeveloped area on the Forest will remain undeveloped when the Plan is redone in 10-15 years. These areas will be reconsidered for wilderness designation when the new plan is prepared.

11-2

We continue to feel that the wilderness study areas should not be recommended for wilderness. The Hells Hole Wilderness Study Area was originally part of a larger RARE II area that extended into Arizona. The Arizona portion contained an ecosystem that was under-represented in the Wilderness System, so the whole area was designated a Future Planning Area in the RARE II process. When the New Mexico Wilderness Bill (Public Law 96-550) was passed, the area was designated a Wilderness Study Area. Since that time, the Arizona Wilderness Bill released the Arizona portion for other multiple uses. Since this was the portion that contained the under-represented ecosystem and since the existing wilderness on the Gila already contains many acres with vegetation similar to the New Mexico Hells Hole Wilderness Study Area, wilderness designation of the area would not contribute significant ecological diversity to the Wilderness System.

In addition to the area not contributing significant ecological diversity to the existing Wilderness System, the present and expected future recreational use of this type of area would be low. Similar types of areas in the existing Gila Wilderness, the Blue Range Wilderness, and the Aldo Leopold Wilderness receive very light use. The existing wilderness areas can provide for the expected increased use for wilderness recreation in this type of environment.

The Lower San Francisco River Wilderness Study Area was designated a Wilderness Study Area by the New Mexico Wilderness Bill. This area has been accessed by vehicles for recreational purposes for many years. We have repeatedly reviewed the effects of this use and have not found unacceptable resource damage. In recent years vehicles have been used by 60 to 85 percent of the recreationists using the canyon. Vehicle use seems to have stabilized at a level considerably below the level of the late 1970's and 1980. Analysis of permits indicate that the majority of this use occurs in the section of the river above Mule Creek. This is the only area on the Forest where this type of an environment can be accessed by vehicles. As a result, it provides a unique motorized recreation opportunity. This use of the canyon, and the existing wildernesses ability to provide for the expected increased need for wilderness recreation is the basis for the non-wilderness recommendation.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

The treatment of the two WSA's fails to measure up to the study requirements set out in CALIFORNIA v. BLOCK, 690 F.2d 793 (9th Cir. 1982), and in the NFMA rules, 36 CFR 219.17(b)(2). To begin with, the range of alternatives is heavily skewed against wilderness. Only ONE alternative out of seven recommends any wilderness at all. With a reasonable range of alternatives, other alternatives, such as B or E, should include some recommendation. Further, given the admitted lack of commodity trade-off with wilderness for these two areas, it prejudices the consideration of wilderness when only ONE alternative that recommends it also happens to be the alternative with the lowest timber yield. The DEIS and draft plan also fail to meet the requirements of BLOCK and the regulations about adequate site-specific descriptions of the areas and consequences of non-wilderness designation. For example, the impacts of continued ORV use in San Francisco Canyon are not fully and objectively examined.

The Draft Environmental Impact Statement (DEIS) fails to discuss the future of existing roadless areas adequately. It only makes general qualitative statements such as, "All alternatives except Alternatives E and F tend to reduce the acres available for semi-primitive non-motorized recreation." (p. 56, DEIS).

We urge you to develop and display the specific data about the amount of roadless land to be entered (by roading and logging and other developments) during each decade of the plan. From communication with planning staff, we are informed that about 135,000 acres of roadless land is determined as suitable for timber management. Over 50,000 acres will be entered in the first two decades and virtually all of it will be entered over the first five decades. Such impacts are very striking and should be clearly set out for public consideration. Further, the specific resource trade-offs of this roadless area need to be fully examined. For example, the NFMA rules require that these impacts be examined on "recreation opportunities, activities and quality of experience (36 CFR 219.12(d)), and "both the landscape's visual attractiveness and the public's visual expectation (36 CFR 219.12(f))." The draft documents do not adequately describe or examine the total impacts of the loss of roadless areas.

The discussion of wilderness in the DEIS should be broadened to include all roadless lands with wilderness potential. As stated previously, the New Mexico Wilderness Act of 1980 does not restrict consideration of wilderness issues in the forest plan to suitability recommendations for the Lower San Francisco and Hell's Hole Wilderness Study Areas. How will the various alternative plans affect other roadless lands that could be considered for wilderness designation in the future? This is an important issue, and the DEIS should address it.

The DEIS should list all RARE II roadless areas in the Gila that were not designated wilderness by the New Mexico Wilderness Act. For each alternative, it should show in tabular format which ones will remain roadless/untimbered/undeveloped during each of the next five 10-year planning periods and which ones will not. A precedent has been established for this in Region Six, which the Gila Plan might well emulate, which addressed the public issue of roadless area management with the attached direction about the use of a so-called Appendix C. Under this direction, each roadless area will be identified and described with its special features. The impacts of each alternative are also to be specified and described. This is a sound and useful way for the planning process to address the issue and concern of roadless area management.

Even though the present recommendation for these areas is non-wilderness, there are no major developments planned in the area in the first decade. Vehicle use of the San Francisco River canyon will continue to be monitored and managed. These areas will be managed to maintain their semi-primitive recreation opportunities.

11-3

We agree. A wilderness recommendation for the two Wilderness Study Areas has been added to Alternative E in the Final Environmental Impact Statement. In addition, an alternative not considered in detail was added to evaluate the impact of not logging presently unroaded areas and the steep slope areas on the Forest.

11-4

Site-specific descriptions of the areas and the consequences of non-wilderness designation have been included in the technical reports on the San Francisco River and the Hell's Hole Wilderness Study Areas. A summary of these documents was included in Chapter 4 of the Draft Environmental Impact Statement. The impacts of continued ORV use in the San Francisco Canyon has been expanded in this chapter of the final Environmental Impact Statement.

11-5

We agree with the need to evaluate the effects of the various alternatives on presently unroaded areas of the Forest. In Chapter 4 of the Final Environmental Impact Statement we have added a table that shows how much undeveloped area on the Forest will be developed in the various alternatives.

We do not agree, however, that the DEIS did not adequately examine the effects of the various alternatives on recreation opportunities, activities and quality of experience and the visual resource. We feel that the Recreation and Visual Resources sections of Chapter 4 explain the potential effects of the various alternatives.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

11-6

We recommend that no logging or road building be scheduled for any of these roadless areas during the first 10-year period. By so doing, the Forest Service will retain the option of considering these lands for wilderness designation during the next cycle of forest planning.

We would like to see the following areas identified as potential wilderness with the appropriate interim roadless protection and inclusion in a formal wilderness adoption process in the second decade planning.

* areas along the Mogollon Rim, the Blue Range, and the Gila Wilderness of approximately 125,855 acres

* Eagle Peak (30,380 acres). (We are informed that Eagle Peak is to be entered in the first decade and strongly object to this proposed logging.)

* some 170,160 acres adjacent to the Aldo Leopold Wilderness

* San Francisco Box (40,050 acres) located east of Luna and north of Reserve (and slated for logging in the first planning period.)

* and in specific, three RARE II areas north of the Blue Range Wilderness Area: Aspen Mountain (22,110 ac), Nolan (12,200 ac) and Mother Hubbard (6,090 ac). All three, particularly Nolan and Mother Hubbard, appear to include Logical Timber Management Areas that are slated for logging in the first planning period. (Aspen, Nolan, Mother Hubbard and Frisco Box all got high (> 20) wilderness attribute ratings during RARE II.)

We urge you to identify these areas as roadless and wild and provide for continued roadless management so that the areas can be considered for wilderness when this plan is revised.

TIMBER UNEVEN AGE MANAGEMENT

Were we tree farmers, even age management would make for efficient farming. In the forest also, even age management makes for efficient tree farming. Unfortunately, there are conflicts with such a practice and it is our recommendation that a natural uneven age situation will yield long term general environmental advantages that will be collectively more valuable than an artificial forest. Does NEPA require greater exploration of the development of an alternative which uses a predominantly selective cutting system?

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain their semi-primitive recreation opportunities. This means that only 3% of the existing unroaded area on the Forest would be developed during the life of the Plan. Of the areas specifically mentioned, the following acres would be affected by development activities during the first decade. Areas not developed would be managed to maintain their semi-primitive recreation opportunities.

UNDEVELOPED AREA	EXISTING AC.	AC. AFFECTED	APP. % OF
Adj. to Gila Wilderness	73,515	1,050	1%
Adj. to Aldo Leopold Wilder.	96,055	0	0%
Devils Creek	89,585	2,500	3%
Nolan	11,630	0	0%
Aspen Mountain	19,510	1,907	9%
Mother Hubbard	6,090	0	0%
Frisco Box	40,050	1,950	5%
Sawyers Peak	64,200	0	0%
Eagle Peak	27,180	7,105	23%
Taylor Creek	6,130	0	0%

11-7

NEPA requires the consideration of a range of alternatives but does not specifically address silviculture or harvest methods. Section 6(g)(3)(F)(i) of the National Forest Management Act requires that evenaged management systems must be appropriate to meet the objectives and requirements of the Forest Plan. There is no indication in NFMA that unevenaged management systems must be determined to be inappropriate before evenaged systems can be selected. In some cases, both evenaged and unevenaged systems may be appropriate to meet the goals and objectives of the Forest Plan. Then, selection of a shelterwood evenaged management system is discretionary as long as the goals and objectives of the Forest Plan are met.

Both evenaged and unevenaged management systems were evaluated for Southwestern Forest types in the Southwestern Regional Guide. Regulation 36 CFR 219.9(a)(5)(i) requires that the Regional Guide prescribe appropriate harvest cutting methods to be used within the Region according to geographic areas, forest types, or other suitable classifications. Pinyon-juniper, Rocky Mountain aspen, Southwestern mixed conifers, Southwestern Ponderosa pine, and Engelmann spruce-subalpine fir forest types were evaluated for the Southwestern Region. Silvicultural characteristics, shade tolerance, reproductive characteristics, existing stand structure, and incidence and susceptibility to insect, disease, and windthrow were all considered in determining appropriate management systems for each forest type (EIS Regional Guide, Appendix D). In most forest types, both evenaged and unevenaged management were considered appropriate in some circumstances. However, after all factors were considered, evenaged systems were selected as most appropriate for forest types in the Southwestern Region. [Regional Guide, page 3-12 through 3-15, FEIS Regional Guide, page 2-21 through 2-24].

The evaluation done for the Southwestern Regional Guide determined that unevenaged management is most appropriate for use in certain special management areas to meet Forest Plan objectives [Regional Guide, page 3-12 and 3-13]. Since the required evaluation of appropriate management systems was done and resulting direction was published in the Regional Guide, there was no compelling need to re-evaluate the appropriateness of evenaged management systems.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

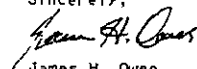
#9 Law enforcement needs to be increased to address cultural resource theft, fuel wood poaching, ORV abuses, illegal grazing, etc

#10 Trail maintenance in the Gila is not adequately addressed. The general trail system is in need of major repair

#11 Road construction should no longer be subsidized by the public sector when the primary use is for timber sales

#12 New roads mean greater negative ORV related impacts and the benefits of fire control access provided by these roads are negated by the greater potential for the incidence of fire that they represent. Efforts should be made to keep roads within the forest to a minimum and certainly not to increase road mileage

Sincerely,



James H. Owen
Gila Planning Review Chair
El Paso Regional Group
Sierra Club

(Legal Consultant Peter C. Kirby, Senior Council Resource Planning and Economics Department, Wilderness Society)

Agency response to
El Paso Regional Group
Sierra Club

Responses to the summary portion of the cover letter are addressed where these comments appear in the detail comments that the Sierra Club provided.

(111)

LETTER 11

The preferred action option allows for only a limited amount of old growth (>120yrs) forest areas. It is pointed out that these are more susceptible to disease and insect attack and are less vigorous than younger stands. As this is true, it has not been pointed out that 1) Old growth stands produce the highest quality veneer wood, 2) provide consistently (through time) undisturbed habitat for species of animals particularly stressed by the proximity of humans and their activities. (These are animals with large home ranges such as the black bear, mountain lion and woodpecker.) Thus we suggest that more emphasis be placed on maximizing the return of the land (through old growth stands) than on maximizing the return of profits.

TIMBER BELOW COST SALES

According to a report by the Wilderness Society, as quoted by Pat Remick, UPI reporter in the October 8, 1984 ALBUQUERQUE JOURNAL, the year 1982 was a bad year for forestry in which the government lost 56 cents for every dollar spent in Arizona and New Mexico forests. In 1983, considered an average year, the government lost 33 cents for every dollar in those forests. In the Gila, in 1982, the report showed the Forest Service spent \$1.75 million in management and road costs but took in only \$38,000 in timber receipts for a net loss of \$1.71 million. That was the region's worst rate with the government getting back just two cents on every dollar spent. Even in recent good years, the Forest has lost money with timber sales. A review of the last six years of timber receipts and expenditures confirms the finding that the Gila is a below-cost forest in its timber programs. Attached is a table prepared by Richard Rice from the Wilderness Society using Forest Service data. It shows that over the past six years, including both boom (1980) and recession (1982) years, the forest failed to break-even on the timber sale program and averaged a loss of 19 cents for every dollar spent. (The method used for this table is slightly different than that used in the other study cited by UPI but the finding that this is a sales-below-cost forest is confirmed in both.)

It is ironic that when the State of New Mexico has a senior Senator who spent the summer tied up in Congress with the working out of a national budget addressing a mind boggling national debt situation that a forest in his home state would consider timber sales offered below costs. Historically, the Gila Forest has lost money in this area. The plan has to make sure that a loss is not repeated. The too meager budget provided to the Service by Congress does not allow it to subsidize the timber industry. The management direction, page 21 of the plan, does not address this issue. After all the controversy in this area that seems a serious gloss.

The plan should include a formula that allows marketing when prices are high but when the prices are down precludes the timber sales and directs the budget to other issues. In those years when the prices are up, move the budget focus back to timber because you would be a little ahead on other expenses of the multiple use.

FOREST SERVICE RESPONSE TO LETTER 11

Although evenage management was determined to be appropriate to meet the objectives on most of the suitable timber areas on the Forest, unevenage management was found to be appropriate to meet wildlife goals and visual objectives in some areas. Unevenage management in these areas was simulated by maintaining three or four story stands with RHYLO. Acreages of this type of vegetation manipulation were not included in the Draft Plan but have been added to the Vegetation Manipulation table in the Final Environmental Statement and Plan.

11-8

We agree that old growth is important and should be emphasized. However, we disagree that the Forest Plan provides for a limited amount of old growth. The draft Forest Plan maintained about 76 percent of the existing 301,000 acres of old growth. Because of the changes in the timber harvest program, the final Forest Plan will maintain about 266,000 acres of old growth or about 88 percent of the existing acreage. Old growth acres on the Forest will be almost equal to suitable timber acres.

11-9

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for recreation and fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sales of timber in some areas, for example, are designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

11-10

As we have previously stated, maximizing monetary profit is not the primary objective of National Forest management. Factors other than timber price such as staffing, dependent communities, wildlife habitat needs, national priorities, local milling needs, etc. have an influence on the timber sale program. We will, however, continue to explore this proposal and implement it to the extent that our regulations and other objectives will allow.

LETTER 11

As the U S public receives net income from sale of oil leases, so too should the U S public receive a net income from timber sales. This should be specified and required in the proposed alternative and tied to market values as game quotas are tied to yearly reproductive success of species. Requiring a profit on timber would be no more difficult than determining hunting limits each year.

The recent Colorado decisions (July 31, 1985, San Juan, Grand Mesa, Umpahone, and Gunnison. Office of the Sec. of Agriculture to Max Peterson) should make it clear that uneconomic timber sales are a history which violated NFMA, NEPA, and administrative law and are not to be tolerated in the future not only for legal reasons but for potential significant harm to the environment as well.

FOREST SERVICE RESPONSE TO LETTER 11

11-11

The allowable sale quantity (ASQ) from the Maximize Present Net Value Assigned Benchmark is considered the most economically efficient timber sale level. This is because above this level, priced monetary benefits are traded off for additional timber. On the Gila, the monetary benefit reductions that result from providing timber above the Maximum PNW Assigned Benchmark level, are primarily due to decreases in game and non-game wildlife related recreation (an assigned benefit). The Maximum PNW Assigned Benchmark provided a first decade allowable sale quantity of approximately 25 million board feet.

Even though this 25 million board foot level is considered the most economically efficient timber sale level, it is not the highest timber harvest level at which monetary benefits exceed costs. The Maximum Market PNW Benchmark level provides information on the point where additional costs do not result in timber benefits that are greater than these costs. The Maximum PNW Market Benchmark provided a first decade allowable sale quantity of approximately 43 million board feet.

The revised allowable timber sale quantity in the Forest Plan is 30 million board feet per year. Even though this is above the most economically efficient timber sale level (the Maximum Assigned PNW Benchmark level), timber costs are below monetary timber benefits at the total Forest level. (Timber outputs are below the Maximum PNW Market Benchmark.) Because timber benefits used in the plan are average timber values for a series of years, there is a high probability that timber benefits on some individual timber sales will be below the costs of preparing and administering the sales. This will happen primarily in years when timber values are below the average value used in the plan.

Allowable timber sale quantities above the most economically efficient level and timber sales where monetary timber benefits are below the costs of preparing and administering sales do not violate Congressional intent, NFMA, NEPA, or administrative law. The decision (July 31, 1985) by the Secretary of Agriculture on several Colorado forest plans clearly points this out. There is no implication in the Secretary's decision that timber sales which have costs exceeding projected revenues are illegal or in any way prohibited. The following excerpts from the Secretary's decision clarify Congressional intent.

BACKGROUND

Pursuant to the Multiple-Use Sustained Yield Act of 1960 [16 USC 520-531], the Secretary of Agriculture is required:

"to develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom. In the administration of the national forests due consideration shall be given to the relative values of the various resources in particular areas." [16 USC 529].

"Multiple use" is defined in the Act as:

"the management of all the various renewable surface resources of the national forests so that they are utilized in the combination that will best meet the needs of the American people, making the most judicious use of the land for some of all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions ... with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output." [16 USC 531].

It is clear from the definition of multiple use that Congress did not intent that the national forests be managed to maximize direct financial returns to the Treasury. However, neither did congress intend that the Forest Service ignore economic considerations in its decisionmaking. The Forest and Rangeland Renewable Resources Planning Act of 1974 [RPA], as amended by the National Forest Management Act of 1976 [NFMA], contains several references to the need to consider economics in the national forest planning process. Section 4 of RPA requires that in developing the Renewable Resources Program there be:

"specific identification of Program outputs, results anticipated, and benefits associated with investments in such a manner that the anticipated costs can be directly compared with the total related benefits and direct and indirect returns to the Federal Government" [16 USC 1602 (2)].

Section 6 of NFMA requires the Secretary of Agriculture to develop, maintain and revise land and resource management plans for the national forests and national grasslands. The Secretary is required to:

"promulgate regulations, under the principles of the Multiple-Use Sustained-Yield Act of 1960, that set out the process for the development and revision of the land management plans, and the guidelines and standards prescribed by this subsection." [16 USC 1604 (g)].

Section 6 of NFMA also requires that the planning process for individual's national forests consider economics and be linked directly to the goals of the RPA Program. The regulations required by Section 6(g) must include:

"guidelines for land management plans developed to achieve the goals of the Program which - (A) insure consideration of the economic and environmental aspects of the various systems of renewable resources management..." [16 USC 1604(g)(3)].

Section 6(g) also requires that as a prerequisite for timber harvesting:

"the potential environmental, biological, esthetic, engineering, and economic impacts on each advertised sale area have been assessed, as well as the consistency of the sale with the multiple use of the general area." [16 USC 1604(g)(3)(i)].

Section 6(k) deals with the identification of lands unsuitable for timber production:

"In developing land management plans pursuant to this Act, the Secretary shall identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors to the extent feasible, as determined by the Secretary, and shall assure that, except for salvage sales or sales necessitated to protect other multiple-use values, no timber harvesting shall occur on such lands for a period of 10 years." [16 USC 1604(h)].

Thus, economics is one of the factors that must be given consideration in identifying lands unsuitable for timber production under Section 6(k). However, the Secretary is to consider "other pertinent factors" as well.

Section 6(k) also requires the Secretary to:

"formulate and implement, as soon as practicable, a process for estimating long-term (sic) costs and benefits to support the program evaluation requirements of this Act. This process shall include requirements to provide information on a representative sample basis of estimated expenditures associated with the reforestation, timber stand improvement, and sale of timber from the National Forest System, and shall provide a comparison of these expenditures to the return of the Government resulting from the sale of timber." [16 USC 1604(1)].

DISCUSSION

The previously cited statutory references make it clear that Congress intended that economic factors should be one of the considerations which shape the development of the Renewable Resources Program and the national forest land management plans which are a part of that Program. Just as clearly, Congress also intended that non-economic factors be considered in the development of these plans.

The Secretary has duly promulgated the required NFMA implementing regulations at 36 CFR part 219, hereinafter referred to as the "NFMA regulations". Section 219.1 of these regulations establishes that the purpose of forest planning is to "provide for multiple use and sustained yield of goods and services from the National Forest System."

One of the characteristics of national forest lands that greatly complicates decision-making is that these lands must be managed for both market and non-market resource outputs. The national forests must be managed for various multiple uses - some of which are priced and for which revenues are received, some of which can be priced in dollar terms but for which no revenues (or revenues representing less than fair market value) are received, and some of which cannot be readily priced in the market sense, or otherwise valued in dollar terms commensurate with priced outputs. Two examples of non-priced benefits are protection of threatened and endangered species and protection of down-stream water quality.

The goal of national forest management is to provide a level and mix of multiple uses, both priced and non-priced, that is optimal, now and for the future, to the national welfare. This, of necessity, involves subjective judgments about the relative value of various specific priced and non-priced objectives and outputs, as well as the value of responding to various issues raised by the public during the planning process. It is through the planning process that alternatives providing various mixes of priced and non-priced objectives and responses to expressed public issues are analyzed and evaluated and decisions ultimately made as to how these lands are to be managed.

A further complicating factor results from the fact that many Federal resource investments produce joint outputs - some of which are priced and some non-priced. A road investment may produce timber outputs, may be used for a wide range of recreational activities, and can reduce the cost of protection from fire or insects. A timber sale may be designed to achieve habitat objectives which increase opportunities for both consumptive and non-consumptive wildlife uses. The cost of a national forest timber sale is often increased and/or the revenues generated from that sale are reduced when non-timber multiple use objectives are achieved through the timber program. Yet the timber program may be the most cost effective way to achieve such multiple use objectives.

It is difficult, and in many cases impossible, to allocate many timber sale costs in a non-arbitrary manner among the various multiple-use functions, such as timber, recreation, watershed management, and protection. Any analysis, however, can and should attempt to identify and account for the full estimated value of the joint benefits produced by such investments. Even after this accounting is completed, however, there will be both values and costs and responses to public issues that are not easily quantifiable or measurable in dollar terms but which none the less must be considered in decision-making.

The above background and discussion show that economic efficiency is only one component of public benefits to be considered in National Forest management. The increment of allowable sale quantity in the final forest plan which is above the most economically efficient level provides benefits which would be lost if the allowable sale quantity were limited to the economically efficient level. The Proposed Action Alternative provides receipts to the U. S. Government 21 percent higher than the Maximum PNV Benchmark. It provides for the maintenance of a viable timber mill operation in a community heavily dependent on timber industry jobs. In addition to the higher U. S. Government receipts, it would provide revenues to the counties approximately equal to those provided in the past. This would help maintain the existing quality of local school systems. The increased intensity of management on the suitable timber acres would also provide for a higher level of dwarf mistletoe control.

11-12

As a result of your concern, we tested the economical efficiency of logging cable areas and non-cable areas. We found that with the Forest providing 30 MMBF of sawtimber in the first decade and with the new timber benefit values used in the Final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with cost. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with only tractor yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than the volume in the Final Alternative. This is because of the relatively high volume per acre on some of the steep slope portions of the Forest. These results are consistent with experience on other Forests in New Mexico. There appears to be a common assumption that cable logging is inherently uneconomical. This assumption has been apparent in reviews of New Mexico Forests by CHEC. However, review of specific timber sales has shown the assumption to be incorrect. The economics as well as other potential benefits of cable logging need to be examined on a specific case-by-case basis. (A more detailed explanation is included with the response to the CHEC comments.)

Considering the concern by your organization and others for steep slope logging on the Gila National Forest and the fact that the timber industry has made a financial commitment to log such areas (through the purchase of equipment) we feel that a constrained level of 5 MMBF to be logged per year with cable systems is a good compromise level. This level was also based on your concern for acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage would be logged than if a comparable volume were taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent sloped and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would have to be managed in all of the Logical Timber Management Areas on the Forest. We did not feel that doing this would be very responsive to your concern related to entering presently undeveloped areas. Logging some cable volume results in less acres being logged in the first decade and more area remaining unharvested.

TIMBER CABLE LOGGING

The Gila planning should profit from the experience of other Southwest forests in terms of cable logging. The Carson National Forest for example has offered six timber sales since 1982 which included steep slopes which must be skyline logged. Since this technique is far more expensive than tractor logging, and the expense would not justify a timber purchaser paying anything for the timber, an equal or greater volume of timber which could be tractor logged was included in every skyline sale. In the Gila, we were told by Gerry Engel, more stringent environmental protection policies will be required, making the wood even more expensive to extract. Economically, this does not make sense to us and we believe the policy was presented as a viable option not on its own merits but rather resulted from pressure to expand future yield in a forest that can't really handle an increased future yield.

12

We also believe that a side negative environmental aspect of skyline logging is that it opens up more area to be logged thus the construction of additional roads necessary should be considered as adding what all roads add, the single greatest source of erosion and water quality degradation

Crews working on foot on the steep slopes, the mechanics of constructing the skyline system, the change of the environment after harvesting, etc will have to increase the rate of soil erosion in such an environment. Recovery rates would have to be slower and we are concerned if they would ever recover.

We are concerned that trees left standing during cable logging would be severely damaged or killed, exacerbating already severe problems we anticipate with regeneration on steep slopes.

Another concern is that timber contractors in the southern part of the state do not have the equipment, expertise, or financial incentive to conduct cable logging operations.

One fourth of the total timber harvest in the first decade and over one half in the fifth decade coming from steep slope areas doesn't seem realistic.

In summary, we believe the steep-slope areas proposed for cable logging are physically, environmentally and economically unsuited for timber production. We recommend that the draft Gila Forest Plan be revised to eliminate scheduled timber harvests in these areas. If the RPA goal for timber output in the Gila can be met only by logging steep slopes, then the RPA is flawed. We recommend that the Forest Supervisor request from the Regional Forester a reduction in the timber-output goal for the Forest.

TIMBER HARVEST

The WALL STREET JOURNAL (editorial page, November 14, 1984) commented, "The Forest Industry Council estimated in 1980 that domestic timber demand in the year 2030 could be supplied by private forests alone, using intensive timber management practices, if landowners could realize a 10% annual return on investment. Unfortunately, the continuation of below-cost timber sales in the national forests retards this development." "Limiting timber harvesting on the national forests to lands that are economically suitable will save taxpayers dollars, encourage timber production on private land, reduce environmental damage, and retain society's future options for the uncult forests." We certainly concur with this point of view. Timber harvest must be maintained on a renewable basis that have absolutely no permanent negative impacts on the integrity of the forest. Section 13(a) of RPA, as amended by NFMA, requires the Forest Service to "Limit the sale of timber from each National Forest to a quantity equal to or less than the quantity which can be removed from each forest annually in perpetuity on a sustained yield basis."

Why are areas in the visual quality class going to be reduced over time? Seen areas along travelways have more soft value than the hard value of lumber.

11-13

We disagree. As mentioned in the response to #12, cable logging actually results in less acres being logged in the modified Proposed Action Alternative than if cable areas were not logged. Also, fewer miles of roads would be constructed rather than more.

11-14

We disagree. Cable logging activities result in less soil disturbance than tractor logging. This activity will result in some additional soil loss (as indicated in the Environmental Impact Statement), but this soil loss will not result in reduced long term productivity.

11-15

In a well designed cable yarding operation with a skilled cable yarding system operator damage to the residual stand of timber is usually less than in a tractor operation.

11-16

We disagree. Southwest Forest Industries and White Sands Forest Products both have access to skyline yarding systems. White Sands has had a skyline yarder for about seven years and Southwest has had access to a system for about three years. Both of these companies are interested in cable sales on the Forest.

11-17

The portion of volume coming from cable areas has been changed in the final alternative. The amount logged in the first decade has been lowered from 8.5 MMBF per year to 5 MMBF per year. That is approximately one sixth of the total volume and is approximately 59 percent of the volume logged with cable systems in the original Proposed Action Alternative.

11-18

Our response to your summarized concerns would be the same as our response to your comment 12.

11-19

No alternative presented in the Environmental Impact Statement harvests timber above the sustained yield level for the alternative. The sustained yield varies from alternative to alternative because the acres managed for timber vary and the intensity of management varies, but each alternative harvests at or below the sustained yield level. The model used for Forest planning contains several constraints to insure that the sustained yield level is not exceeded.

11-20

We share your concern for visual quality on the Forest and feel that we have provided for adequate protection. Visual quality objectives have been established for all areas of the Forest. These objectives take into consideration distance from major travelways and the position of areas in relation to where the area will be viewed from. Higher priority was given to maintaining existing visual quality along major travelways and in foreground viewing areas. Most of the anticipated change in visual class will result in less visible areas. Timber and fuelwood activities are the primary activities that can affect the visual characteristics of an area. Even though special management practices are used to reduce the visual impacts of these activities when these activities are conducted along primary travelways, some change in visual quality may result. This change will be limited by the Standards and Guidelines in the Plan. These Standards and Guidelines state that "variations in Visual Quality Objectives

The main emphasis of the timber management plan is to create a general long term sustained yield situation in suitable portions of the Gila area. Only a limited list of management procedures is outlined under "Management Direction" (chpt 4, p 37-38 E 00-E 09), and precise methods and controls of reforestation have been largely omitted. For example, E 04 refers to "regeneration by artificial means" and site preparation "by chemical methods." What specifically is meant? Does this entail such silvicultural practices as TSI with herbicide injection into undesirable or non-commercial species and if so would it be chemicals such as 2-4-5-T or 2-4-D? If so, we strongly are against the use of herbicides in this manner (whether by injection or spray) as it involves LARGE amounts of the poisons. Also, if natural reseeding of these "non-desirable" trees is to take place, will seed trees be left standing at suitable intervals.

21

The large increases planned for sawtimber sales will require the use of lands that are essentially uneconomic for timber production in violation of section 6(k) of the National Forest Management Act and the Department of Agriculture policy.

22

Among our many objections to the PA's timber harvest level, we cannot find any supportable foundation for the projected future need. It is an arbitrary figure. Our attached table compares the volume of sawtimber offered in the past six years to the volume actually sold. An average of 45 mmbf was offered annually but only 21 mmbf, LESS THAN HALF, was actually sold. Thus the Gila is currently offering far MORE than the present use need. Nevertheless, the Forest Service projects a future use of 99 mmbf in the fifth decade, about a FIVEFOLD increase from the current use. What is the basis of this projection? How many new sawmills does the Forest Service expect will be built in the area to provide this use? If the Forest Service expects that these mills will rely on Gila National Forest timber, then you must address the following questions from the MacCleery opinion (p 9): "Since there is no indication in the planning documents that increases in timber sales will be made only if there is an increase in demand and prices for timber, an explanation is needed as to why increasing the dependency of local community mill capacity and jobs which could result from an increase in sale of National Forest timber with revenues exceeding cost will contribute to greater national or local welfare -- especially since increased dependency upon submarginal timber sales would seem to result in potentially greater community instability due to uncertainties over continuation of a relatively high level of Federal funding to support a timber program with costs greater than revenues."

23

While clear cutting seems not an issue in the plan, it still seems necessary to point out our objections to such practice in a national forest. 1) Nutrient loss in soils trees act a "nutrient pumps" which maintain Ca, K, P, and others in upper soil layers and in the trees. Once removed, these nutrients wash away. 2) Even-aged stands are subject to diseases which can devastate the stand. 3) Reduced diversity. Clear cutting in steep terrain facilitates soil nutrient loss at an accelerated rate. If it is to be used at all it should be restricted to areas of low relief

from the acreages presented in the specific standards and guidelines for management areas are as follows:

No variation in Preservation Area Objectives
 + or - 2 percent variation in Foreground Retention Area Objectives
 + or - 5 percent variation in Middle and Background Retention Area Objectives
 + or - 5 percent variation in Foreground Partial Retention Area objectives
 + or - 10 percent variation in Middle and Background Partial Retention Area Objectives
 + or - 10 percent in all Modification Areas".

In addition, no area can move downward more than one class.

11-21

The Forest Plan is not designed to set specific project level management direction for every area on the Forest. It is not possible or desirable to set project level management standards with the type of data used for Forest level planning. The standards and guidelines to which you refer are designed to set management direction while leaving options available for the on the ground manager. The use of chemicals was mentioned as an option that can be used, but it will only be used if the chemicals involved are approved and can be used in an environmentally sound manner. No use of 2-4-5-T or 2-4-D is being planned. Site specific environmental analysis will be done for individual projects to determine the best treatment for each project.

11-22

As mentioned in our response to previous comments, the volume in the Proposed Action Alternative has been reduced from 35 MMBF in the first decade to 30 MMBF. The long-term demand is now projected to be level rather than increasing as previously projected. Because of the change in the benefit values used for timber, however, some chosen prescriptions may still have higher costs than anticipated dollar benefits. This does not mean that we are not in compliance with the National Forest Management Act. The regulations (CFR 219.14(c)(3)) say that lands shall be identified as not appropriate for timber production if "the lands are not cost-efficient over the planning horizon in meeting forest objectives, which include timber production." The FORPLAN model used by the Gila insures that the lands allocated are the most cost-efficient areas to meet the objectives of the alternatives. Even though short term costs may be higher than the benefits, the model insures that the areas chosen meet the plan objectives on the areas where this difference is the smallest.

11-23

The Gila did not estimate demand for sawtimber and products using all of the explanatory variables which might be suggested by conventional economic theory. That is to say, the Gila did not empirically estimate anticipated future needs for sawtimber and products considering future estimates of incomes of consumers, tastes of consumers, technological advances, relative supplies and prices of all other goods, and preferences of consumers, etc. as is usually suggested in conventional microeconomic theory. Such an approach would result in an estimate of the price-quantity relationship often depicted in conventional supply-demand schedules. However, this methodology is impossible to implement without both exhaustive funding and time.

The Gila used the approach of examining the historic pattern of sales. The future need figures used in the Draft Environmental Impact Statement were based on the timber sold between 1971 and 1980. The data used for this projection is displayed in the Draft Environmental Impact Statement in Table 21. Table 21 was also intended to show the timber sold in 1981 through 1984 and the average volume sold during the 14 year period. During the public

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

TIMBER: NONDECLINING FLOW

The Forest Service sells timber in board feet, but it calculates nondeclining harvests in cubic feet. Because the number of board feet per cubic foot declines as trees get smaller, we are concerned that board foot timber sales will decline over time even though cubic foot harvests are nondeclining. Average projected tree diameters were not a part of this plan.

24

FISCAL AFFAIRS

The federal budget is certainly not a part of this plan however we would like to comment from a philosophical point of view that the basic laws guiding management of the national forests are founded on the principle of multiple use conservation. The fiscal year 1986 forest service budget suggests that the Multiple-Use Sustained Yield Act, the National Forest Management Act, and the National Environmental Policy Act are meaningless. Timber sales, minerals, and grazing budget totals approximately \$600 million in contrast with the resource stewardship programs which are only allocated one fourth of this amount or \$170 million. Also, a principle purpose for establishing the national forests was for watershed protection, yet the soil and water program remains a very small portion of the budget (3%) and is being further cut.

25

involvement period, we discovered that the information for the last four years in the table was timber offered, not timber sold. This table has been corrected and a new average has been calculated based on the corrected information for 10 to 15 years. This average is considered to be the demand in the first decade. The existing mill capacity is above this figure. Considering the existing mill capacity and the volumes that have been sold in years when the economy was strong, we have now projected the long term demand level to be approximately 30 MMBF. The timber issue discussion has been modified to reflect this level. The proposed action has been modified and has an allowable sale quantity equal to the average volume sold in the last 10 to 15 years.

11-24

Section 12(a) of NMMA and Regulation 36 CFR 219.16 require that the quantity of timber planned for sale be equal to or greater than the quantity planned for sale for the preceding decade, provided the planned sale quantity does not exceed long-term sustained yield capacity. It is Forest Service policy that cubic foot volume will be used as the control in regulating the amount of timber to be offered and sold as specified by the allowable sale quantity. (FSM 1982.15--1 Amendment 19)

Basic inventory data, growth formulas, yield simulation models such as RMYLD, culmination of mean annual increment [36 CFR 219.16(a)(2)(iii)], and long-term sustained yield capacity are all calculated using cubic foot volume. Therefore, it is appropriate that allowable sale quantities which are based on these factors also be regulated using cubic foot volume.

Cubic foot volume is an actual measured volume and is an accurate measure of the wood fiber in a tree. Once harvested, the wood in a tree can be used for a variety of end products including pulp, poles, lumber, and veneer. Board foot volume measure, on the other hand, is an arbitrary estimate of how much lumber can be obtained from logs. Board foot volume estimates make assumptions about products to be produced from the timber as well as the milling equipment that will be used. Small material is overlooked in board foot volume estimates. Board foot volume estimates, therefore, are not an accurate measure of the wood actually harvested and it is logical to control maximum harvest level (allowable sale quantity) on the more accurate cubic volume measure.

Timber harvest volumes, while calculated in cubic feet, are converted and shown in board feet in the documents for the convenience of readers who may be more familiar with board foot volume estimates. However, growth, yield, and limitations on harvest level are based on cubic foot measurement. Variations in board foot volumes merely indicate harvests of varying sized trees rather than a declining yield.

Use of cubic foot volume as a basis for planned sale volume complies with Forest Service policy and the letter and intent of legal requirements.

11-25

The Multiple Use Sustained-Yield Act of 1980 authorizes and directs the Secretary of Agriculture and the Forest Service "...to develop and administer the renewable surface resources of the national Forests for multiple use and sustained yield of the several products and services obtained therefrom". It continues by saying that, "In the administration of the national Forest due consideration shall be given to the relative values of the various resources in particular areas". Multiple use in this Act is defined as "...the management of all of the various renewable surface resources of the national Forest so that they are utilized in the combination that will best meet the needs of the American people". Nothing in this act says that multiple use can be interpreted as equal budgets for all resources and services.

SOIL

The main concern of the Forest Service, with regard to natural resources, should be to preserve and improve productivity and soil should be no exception

The management direction, page 22 in the plan, says, "Protect and improve the soil resources" yet on page 40 of the standard and guideline K03, K01 states, "Soil loss due to management will not exceed soil loss tolerances." Therefore we interpret "protect" to mean a continued loss of soil on the forest. Anticipated soil loss (Table 5 on page 23 of the plan) seem to a fairly consistent rate all the way to period 5. Is this a reasonable rate for a Southwestern desert forest and it's slow natural soil recovery? Does the plan prescription adequately comply with CFR 219.27 which requires the conservation of soil and water resources and to not allow significant or permanent impairment of the productivity of the land?

A key criteria to measure the effectiveness of the Forest Plan must be that soil loss be less than or equal to soil formation

Does the plan include illegal use such as ORV, grazing, fuel wood theft, etc. in predicting soil loss?

CULTURAL RESOURCES

Members of our group have personally seen evidence of pot hunting in the Gila. One poached site (Rabb Park) was left open by the service after it was discovered. Stronger efforts are needed to conceal archaeological sites and to increase law enforcement to discourage future poaching of this type. (Incidentally the Rabb Park illegal activity was perpetrated over some time, being an extensive dig obviously done by a party with formal archaeological experience.)

The plan states that "No attempt will be made to restore or protect antiquity sites from natural deterioration." That may be proper but the Plan should emphasize protection of such cultural sites, such as dwellings, rock art, and lithic sites which can be damaged by heavy grazing animals, logging, roadbuilding, chaining and other range improvements. When cultural resources are destroyed, the information that they contain is lost forever. This applies to any site whether or not nominated for the National Register of Historical Places.

RESEARCH NATURAL AREAS

Are RNA programs being established to protect cottonwoods in lower elevation riparian areas? Our concern is that cattle are eating new cottonwood growth and when the old trees die, there will be a vacuum in terms of bank stabilization and critically less wildlife habitat. The Middle Box of the Gila is an area that we would recommend for this type of protection. According to Bill Moyer, Upper Mineral Creek is a showplace of ecosystems. We believe it should be in the RNA program. Also, while not RNA, the Tularosa riparian area needs special protection.

11-26

Soil loss on the Forest was tracked in relation to range activities, timber activities, and road construction and reconstruction activities. These three types of activities have the largest potential to affect soil loss. Some localized increases may be caused by ORV use, but these increases are not considered to be significant in relation to the changes in soil loss that can result from the three activities tracked. A copy of the outputs technical report section dealing with how soil loss was tracked was sent to the Sierra Club.

The plan does state that soil loss due to management will not exceed soil loss tolerances. Tolerance soil loss is defined as the maximum rate of soil loss that can occur while sustaining inherent site productivity. This does consider natural erosion and soil formation rates.

11-27

Pot hunting is a problem on the Forest that is expected to continue. Because of the size of the Forest and the remoteness of many parts, it is impossible to completely solve the problem. Control of pot hunting will continue to be a high priority law enforcement activity on the Forest. Increased emphasis on cultural resource protection is planned, but a total solution to illegal excavation of cultural resource sites is not likely.

11-28

The Plan does provide for the protection of cultural resource from ground disturbing Forest Service projects. The cultural resource standard and guidelines in the Plan call for inventory of areas where ground disturbing activities will take place and for protection of any cultural resource sites found during these inventories.

Additional standards and guidelines have been added to the Forest Plan to provide more detail on how we will comply with the National Historic Preservation Act and the Proposed settlement agreement to the Save the Jemez et. al. / State of New Mexico vs. Forest Service litigation. The proposed settlement includes a commitment to prepare a Forestwide cultural resource management assessment within 18 months.

The existing overviews for the north and south halves of the Gila will be reviewed and updated for the management assessment. The Forest Plan standards and guidelines for Cultural Resources include a more detailed description of the management topics that will be included in the management assessment document.

11-29

An area of National Forest system land may be designated as a Research Natural Area (RNA) if it possesses a unique ecosystem type which will contribute to the National Research Natural Area System. In September, 1984, Region 3 completed a Progress Report on Research Natural Areas. During the study for this report a regional task group reviewed the existing RNA's and searched for additional RNA candidates to represent ecosystems that were not included in the existing system. This search resulted in 26 additional areas regionwide for proposed inclusion. Three of these areas--Largo Mesa, Rabbit Trap, and Turkey Creek--are located on the Gila. An establishment report will be written on these areas and they will be protected.

The proposed Turkey Creek RNA will be established to protect an area of broadleaf riparian forest but no montane narrow-leaf cottonwood ecosystem or broad-leafed cottonwood ecosystems representations have been located. As a result, no RNAs are planned to protect lower riparian areas. All of these ecosystems on the Forest have been modified by past use. Since the purpose of the RNA system is to protect substantially unmodified ecosystems, the cottonwood ecosystems on the Forest do not appear to qualify. The area

above the Middle Box has been modified by past cattle grazing and would not qualify. Part of this area (the Gila Bird Area), however, is being managed to protect and re-establish riparian habitats.

The Mineral Creek area was not identified in the regional study as a proposed RNA. As a result it is not proposed in the Plan. We have however, added a standard and guideline to this Management Area stating that we will review this area and determine if a RNA recommendation would be appropriate for any part of the area. No logging is proposed in this area in the first decade.

The Tularosa wetlands area is presently fenced to protect the riparian vegetation. Livestock grazing is limited to only the non-growing season. A stream flows through this area and the water gap fencing does get washed out during periods of flood. When this happens some additional livestock grazing has occurred. The fences are repaired as soon as possible after floods to restore the management system. Some trespass has also occurred in this area. We will continue to try to solve this problem. In addition to the range management plan considerations for the area, there is also a plan to restore a lower stream gradient within this area to control downward cutting by the stream and to protect the wetland.

Two additional standards and guidelines have been added to improve management direction for this area. These are:

Added to range standards and guidelines for Management Area 6A

D02 Tularosa Wetlands Provide growing season rest every year by only using the area between November 1 and March 1. When grazed, limit use to 35 percent on herbaceous vegetation and 20 percent on willows with the objective of improving riparian condition.

Added to wildlife standards and guidelines for Management Area 6A:

C03,C06 Tularosa Wetlands Work toward stabilization of the wetlands and the stream gradient.

Even though no RNAs are planned to protect riparian areas, standards and guidelines have been added to clarify measures that will be taken to improve the condition of riparian areas. These are explained in our response to your concern #45.

11-30

Pest management through the use of insecticides or other means will be evaluated using integrated pest management procedures. Where conditions indicate an impending buildup or outbreak is imminent, an evaluation will be conducted in order to formulate management alternatives to reduce loss to an acceptable level. In the case of grasshopper control involving a mix of lands, it becomes a unified effort on the part of the State Dept. of Ag., APHIS, the private land owner, and the federal land agency to cooperate and accomplish the control.

The inference that the Proposed Action Alternative projected an increase of 46 percent additional wildlife forage and herbaceous cover is correct. The forage is, however, consumed by wildlife, and the increase in cover is generally in small areas for habitat diversity. There will be very little excess biomass remaining to provide for increased grasshopper populations.

INTEGRATED PEST MANAGEMENT

How does insecticide alone in grasshopper control meet the requirement of integrated pest management? For example, what effect will the proposed alternative's increase in herbaceous forage and cover by 46% have on grasshopper epidemics? It seems to us that it will make grasshopper epidemics worse and more common and decrease the value of adjacent private rangeland

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11-31

RECREATION

The tone of the plan seems to address the utilitarian "outputs" of the forest. The concept of recreation as re-creation in terms of getting back to biological, historical, and cultural roots in a pristine, spiritual, sacred, unquantifiable setting is a lacking quality objective.

31

We believe that our National Forests should be the last resort for developed recreation, the private sector having more than adequately taken care of that. The forests can provide what a McDonald's or a ski lift can't. Dispersed recreation should be as high of a priority as developed campgrounds.

The plan, "sets recreation budget levels high enough to maintain most existing dispersed recreation facilities over time." Considering the backlog of dispersed recreation maintenance problems now, the terms "most" and "over time" bother us and seem inappropriate. Trail maintenance in the Gila is not adequately addressed. The general trail system is in need of major repair. The trail construction/reconstruction projection in Table 5, page 23 of the plan won't keep up with mother nature's forces and the trail loss to road building. The forest will continue to lose its trail system under this plan.

We are pleased that the plan intends to maintain a quality corridor for the Continental Divide Trail.

GRAZING

The plan admits current livestock use exceeds production capability yet projects 14.4 MAUMs permitted use over capacity in the first decade then finds through "increased management intensity" 20 additional MAUMs by the second decade. This type of philosophy prompted our general concern # 8.

If permitted grazing use for the Gila Forest is 383,744 MAUMs while the capacity is 314,422 MAUMs, why is not something more than "declining management intensity" being done to reduce the AUMs to a proper level in those areas where the numbers of grazing animals are too high? Overgrazing is a threat to Threatened and Endangered species of plants and promotes soil erosion. It is stated that 35 percent of watershed acres are in unsatisfactory condition due to a loss of vegetative cover brought about by overgrazing. The plan further states that these watersheds will continue to erode and reduce water quality under current management direction. Will the direction be changed enough in the future?

32

WILDLIFE

All species of wildlife requirements for forage and cover should be met prior to the allocation of forage to domestic livestock.

33

We agree that the priority put on managing for dispersed recreation should be as high as the priority put on managing for developed campgrounds and we feel that we have given it as high a priority in the Proposed Action Alternative. We also feel that the level of developed recreation in the Proposed Action Alternative is appropriate. The Proposed Action Alternative provides for the maintenance and reconstruction of existing campgrounds and provides for the development of one additional campground at Quemado Lake. The campgrounds on the Forest provide a type of recreation opportunity in a forest environment or near public lakes that is not normally provided by the private sector.

Trail maintenance emphasis has been increased in the modified Proposed Action Alternative. The proposed trail maintenance budget is approximately 288 percent higher than the 1984 trail maintenance budget. Although some reduction in trail miles will continue [some of the trails on the Forest were constructed for activities that can be accomplished on roads], there should be a significantly higher level of maintenance on trails defined to be part of the permanent trail system.

11-32

You are correct when you state that the permitted grazing use for the Gila Forest is 383,744 MAUMs and the capacity is 314,422 MAUMs; however, we are not sure where the statement "that only declining management intensity is being used to reduce the AUMs to a proper level where grazing is too high" came from. In the Proposed Action Alternative, livestock numbers are balanced with capacity by increasing capacity through improved management and by reducing permitted numbers. We feel that this is the best feasible alternative for solving range management problems on the Forest. In the Proposed Action Alternative, the permitted numbers of livestock would be reduced to approximately 350,000 by the end of the first decade. At the same time, improvements in management would begin to result in a rise in capacity. Improved management would be expected to result in a continued rise of capacity until sometime near the end of the second decade. This change in management direction will result in an improvement in watershed condition over time. Because of the slow improvement in watershed and vegetative condition in the southwest, no management activity could eliminate all unsatisfactory conditions in a short period of time. Management activities are designed to correct the condition that resulted in unsuitable watershed and vegetation conditions. Nature through time, will improve the condition.

11-33

The statement that "All species of wildlife requirements for forage and cover should be met prior to the allocation of forage to domestic livestock" is somewhat ambiguous.

Forage/cover requirements for wildlife species can actually be met under various levels of forage allocation. There is, however, a significant difference in the size of species populations that can be supported under various planning levels of allocation.

Wildlife species requirements for herbaceous forage and cover were used to establish sideboards for allocation of forage and for projecting wildlife populations through the planning process.

Forage habitat requirements were utilized initially to estimate the quantity of herbaceous forage and cover necessary to support a minimum viable population of existing wildlife species on the Forest. This base level of forage was used to approximate the lowest level of allocation that would still enable maintenance of viable wildlife populations. No alternative or benchmark went below this level.

An existing level of wildlife forage use was also developed utilizing current population estimates, species forage requirements and current production utilization studies. This quantified level provided a "basis of comparison" for both allocations and wildlife population levels projected in the Proposed Action Alternative.

We assume your request is to maximize wildlife populations on the Forest. If we were to manage according to this concept, it would result in the elimination of domestic livestock grazing, which we do not consider feasible. Rather than managing for the elimination of domestic livestock or the elimination of any wildlife species, we have chosen to manage to maintain a combination of both. The emphasis levels for livestock and wildlife will provide for a production of livestock from the Forest while providing for an increase in wildlife habitats to help meet anticipated increased demands. This wildlife forage and cover habitat can be utilized by both game and non-game species.

11-34

We believe the Plan emphasized timber production at the expense of indigenous wildlife populations 34

We agree that there will be both positive and negative change in wildlife species and wildlife population levels as a result of timber harvest. Some species will benefit and others will be adversely affected. However, negative changes to any individual species would not result in reducing species population levels or distribution to a point where that species is anywhere near its minimum viable population level.

Change, over time, is also expected to occur in habitat areas that are not harvested.

Successional stages of native habitats have historically been altered through fire occurrence wind throw, insect/disease, etc. Native wildlife species on the Forest adapted historically to periodic changes in these successional stages. The amount and distribution of resulting habitats that resemble those which occurred naturally over time is the key to compatibility of changes.

We feel that change through timber harvest activities can be blended into the overall scheme of natural habitat diversity through a management philosophy we term Integrated Resource Management. This philosophy applies to all resources and uses in a specific planning area. However in this context discussion will be limited to timber and wildlife relationships.

Integrated Management is a project planning process where the desired natural distribution of successional stage habitats, including old growth zones, are blended with the selection of timber stands and timing of timber harvest. The result is a integrated project plan with silvicultural treatments designed to create a desired vegetative mosaic of wildlife habitats in a given area.

The "Integrated Management" concept as proposed in the Proposed Action Alternative focuses on habitat needs of both game and nongame species. Wildlife habitat designs are keyed to four primary data items: the existing habitat status; the native species present; the natural history of the individual management area; and the habitat requirements of individual species.

Primary habitat management objectives are intended to provide for viable and healthy populations of all native wildlife species present on the Forest. Secondary objectives from a wildlife habitat standpoint are intended to maintain and/or restore the naturally occurring amount and distribution of habitats which supported historic species diversity.

Certain game, nongame, and sensitive species may become emphasized in a given management area contingent upon the status of species populations in other management areas of the Forest.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

It is the responsibility of the Service to manage for all species. Many species, such as small rodents and birds depend on say deer and elk forage for food and cover. What of the forage for those species? 35

The statement on page seven of the plan in regards to habitat components, "Even though the quality of habitat declines, ." seems contradictory jargon 36

The goals for wildlife and fish habitat on the Forest (pp. 21-22, draft Plan) should be revised to include as an additional goal maintenance of large tracts of mature and old-growth forest. The wildlife adapted to these advanced stages of forest succession will suffer unacceptable levels of habitat loss in an intensively managed forest unless there is a specific commitment to protect and maintain these habitats 37

11-35

We disagree. It is actually the responsibility of the Forest Service to manage native wildlife species habitats. Management of the wildlife species that utilize the habitats is the responsibility of the New Mexico Department of Game and Fish. Overall management is accomplished through cooperative efforts of both agencies.

We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous Forest habitats are maintained at a level that complements the forage habitats. Game species may appear to be solely emphasized. Because of availability of data, specific game species were selected for tracking. This does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species were included in the indicator species selected. Specific management practices for nongame species are not developed because of the large number of species and the magnitude of information required to track individual species. Effects of management activities on game and nongame indicator species will be monitored.

11-36

The statement in the Plan on page seven reads, "Even though the quantity of habitat declines, the level of coordination and improvements offset the overall impact on carrying capacity". We disagree that this is contradictory jargon. Acreage of habitats are important, but the relative position of habitats to each other can be as important, if not more important than simply acreage of habitat. An example of this situation is found in vast areas (monotones) of high seral stage habitats where natural disturbances have not been allowed to occur.

Restoring the relative juxtaposition of habitats in these areas (ie cover types, water, forage, etc.) results in a shift in habitat acreage. A decrease in some of the high seral stage coniferous Forest habitats may be expected as a result of these shifts. In this case the acreage of certain high seral habitat types is expected to be reduced somewhat while natural habitat diversity and habitat carrying capacity are maintained or restored. The management activity which enables this restoration to occur is accomplished through levels of wildlife habitat coordination and improvement.

11-37

The goal on page 21 of the Draft Plan was to "manage for a diverse, well-distributed pattern of habitats ...". Since old-growth forest is one of the primary types of habitat we are managing for, we feel your concern is addressed in the modified Proposed Action Alternative.

The modified Proposed Action Alternative results in a higher overall level of old-growth habitat than did the original Proposed Action Alternative. The original alternative would have reduced old-growth levels by 24 percent; while, the modified Proposed Action Alternative results in only a 12 percent reduction of old-growth habitat. Only about 272,000 acres of the 432,000 acres of tentatively suitable timber would be available for harvest. All or a significant portion of 48 out of the 108 logical timber management areas would not be scheduled for timber harvest. This also results in maintenance of additional large tracts of old-growth outside wilderness zones. (Also see response to comment 8)

We note that the intent to provide maintenance of habitat and to make improvements to sustain existing habitats, gives priority to Threatened and Endangered Species. We hope that this is not just a required statement, but is an earnest concern for Threatened and Endangered species of plants and animals and an active plan to improve the habitat of the numbers of Threatened and Endangered populations

38

The draft plan does contain a number of specific standards and guidelines for wildlife that are important, that we applaud and that we recommend in the final plan. They include: 1) The commitment not to introduce exotic species or allow them to invade the Forest (p. 33, draft Plan), 2) The commitment to avoid disturbance activities in Peregrine Falcon nesting habitats between 15 March and 15 August (p. 34, draft Plan), 3) The commitment to plan and administer disturbance activities in known elk calving, turkey nesting and raptor nesting areas so as not to disrupt calving and nesting success (p. 35, draft Plan), and 4) The requirement that new and reconstructed powerlines on the Forest meet standards for raptor protection (p. 40, draft Plan).

Also important for wildlife is the timber-management guidelines to close all local roads not essential for management needs upon completion of timber-sale and firewood activities (p. 38, draft Plan). We support retention of this guideline in the final Plan, and we urge that it be implemented conscientiously.

One wildlife guideline that should be expanded is the guideline for recruitment and retention of snags (p. 35, draft Plan). It should be revised to include a commitment to provide snags on ALL forested lands subject to timber management, not just areas adjacent to waters and openings within woodlands and coniferous forest areas. The aim should be to provide adequate snags on all managed stands on the Forest, THROUGHOUT the lives of those stands. The revised guidelines also should include commitments to retain large snags, since they are of greatest value to wildlife, and to maintain suitable mix of hard and soft snags.

39

The final Plan should include a timber-management guideline that all forest cutting blocks will have irregular, meandering borders to maximize 'edge' benefits for wildlife.

40

The draft Plan should be revised to include more comprehensive guidelines for retention of downed woody material on the forest floor. In logged areas there should be a specific commitment to retain at least two uncharred large-diameter logs per acre for wildlife. Also, the guideline for providing slash piles (p. 35, draft Plan) should not be restricted to designated areas near water but should include other logged land on the Forest. Such piles have value elsewhere in the forest and are of value to more than just small game and turkeys. Similarly, all unutilized cull material and slash over 3" in diameter should NOT go to fuelwood (p. 38, draft Plan), some should be reserved for wildlife purposes.

41

From a wildlife perspective, total reliance on even-aged silvicultural systems on the Gila (p. 37, draft Plan) is not desirable. Granted, judicious use of even-aged systems can increase habitat diversity on the Forest, but total reliance on such systems is not beneficial for wildlife species adapted to advanced forest successional stages. To maintain suitable mature-forest conditions for these species, we recommend that uneven-aged management also play a significant part in the timber-management strategy for the Forest.

42

11-38

We have given priority to certain resource management activities in several places in the Plan. You can be assured that none of these are simply required statements. Where the Plan places priority on managing for certain resources or resource activities these priorities become management direction. The Plan would have to be amended before the priority could change.

It is important to note that Threatened and Endangered Species management has always been an important priority on the Gila National Forest. The Forest was involved in development of one of the first T&E species recovery plans in the country, the "Gila Trout Recovery Plan". We have also been actively involved in the actual recovery of that species. Recovery efforts have now improved the status of Gila Trout populations to a point where downlisting from endangered status may soon become a reality.

11-39

We agree that the guideline for recruitment and retention of snags (page 35, Draft Plan) should be expanded. The following statement will be added to help clarify this guideline.

"Maintain approximately 180 snags per 100 acres distributed over the remaining coniferous forest and woodland areas."

11-40

The following timber management guideline has been added to the Forestwide Standards and Guidelines in the Forest Plan.

"Forest cutting blocks will be designed with irregular, meandering borders to enhance 'edge' benefits for wildlife".

This should aid in resolving the concern you have highlighted on page 38 of the draft Plan.

11-41

We agree that the retention of downed woody material on the Forest floor is an important wildlife habitat consideration. The following Forestwide guideline has been added to the Plan to further address this issue.

"Provide an average 2 down logs per acre (12" diameter or larger) or untreated slash piles 10 feet in diameter or a combination of down logs and slash piles over 55% of the forested area.

The following clarification of the guideline for fuelwood use of cull material and slash has also been added.

"Once wildlife habitat and other requirements for down woody material are met, cull material and slash over three inches in diameter will be made available as fuelwood for two years after timber harvest".

11-42

Although unevenage management was not determined to be appropriate to meet the objectives on most of the suitable timber areas on the Forest, it was found to be appropriate to meet wildlife goals and visual objectives in some areas. Unevenage management in these areas was simulated by maintaining three or four story stands with RMYLD. Acres of this type of vegetation manipulation were not included in the Draft Plan but have been added to the Vegetation Manipulation Table in the Plan. The standard and guideline that you referenced on page 37 of the draft Plan has also been changed. The following statement has been added to reflect the fact that unevenage management would be used to meet some of the wildlife objectives.

The draft Forest Plan calls for a 24% decrease in old-growth forest on the Gila after 50 years (p. 7, draft Plan). Because of impacts that would occur to wildlife and to other resources (e.g., recreation, aesthetics, watershed, soils), we believe this decrease is excessive. As the climax stage of natural forest succession, old growth plays an important ecological role on the Forest. It is already a much-reduced habitat on the Gila. Once gone, old growth is not readily reestablished. We recognize that some loss of old-growth forest will take place, but we believe it should be kept to a minimum. We recommend that the Forest Plan be modified so that the reduction in old growth after 50 years not exceed 10%.

In the management prescriptions for specific management areas, the primary wildlife planning emphasis is consistently placed on game species and threatened and endangered species. For only two of the areas does the emphasis change. These are areas 8A and 8B, both largely within the Gila Wilderness, where the emphasis is on maintaining habitat in a condition virtually unaltered by man's influence (pp. 249 & 255, draft Plan). We believe the goal of healthy populations of all forest wildlife can best be met by assigning a different wildlife planning emphasis to some of the individual management areas. On areas 8A and 8B and on other areas, an emphasis on maintaining habitats unaltered by man's influence is appropriate. On still other areas, the emphasis should be on overall species richness. On all areas, of course, threatened and endangered species should receive high priority where their habitats are involved.

We recommend that the management areas on the Gila be reviewed for potential to contribute to overall wildlife diversity on the Forest. For areas with above-average potential, adoption of the following priorities for wildlife planning should be considered: 1) threatened, endangered, and other special-status species; 2) overall diversity of forest wildlife; and 3) game species. A partial list of areas suited to this planning emphasis might include 3C, 4A, 4B, 4C, 5A, 5B, 6C, 7A and 7F. Where changes in wildlife planning emphasis are made, management prescriptions should be revised accordingly.

The existing seasonal off-road vehicle (ORV) closure in the Lower San Francisco River Canyon should be continued, not eliminated as the draft Plan proposes (pp. 135 & 139, draft Plan). The closure has benefits for the whole spectrum of wildlife using this important area. We question the statement that use of vehicles in the river bottom poses no real threat to environmental concerns or wildlife (p. 95, DEIS). Evidence supporting such a conclusion would have to come from long-term studies of the entire wildlife community in the river canyon, conducted during the closure period under conditions of both ORV use and absence of ORV use. To our knowledge, such studies have not been done.

Stands will generally be managed under the even-aged silvicultural system. Cutting methods will be prescribed for specific stands in the silvicultural exams. Unevenage management will be used where needed to meet wildlife habitat or visual quality objectives.

11-43

We agree that old growth habitats are important. The modified Proposed Action Alternative projects a reduction on these habitats of 12 percent rather than the 24 percent reduction projected in original Proposed Action Alternative. [Also see response to comment #8 and #36.]

11-44

We disagree. Game species may appear to be solely emphasized. Because of availability of data, specific game species were selected for tracking. This does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species were included in the indicator species selected for the Forest. Specific management practices for nongame species are not developed because of the large number of species and the magnitude of information required to track individual species. Effects of management activities on these species will be addressed and monitored.

We agree that healthy populations of all forest wildlife species can best be met by assigning a different wildlife planning emphasis to various portions of the Forest and that some areas should be managed to maintain habitats essentially unaltered by man's activities. We feel that this has been accomplished in the modified Proposed Action Alternative. In this alternative only about 272,000 out of the 432,000 acres of tentatively suitable timber on the Forest are projected to be entered during the first 50 years. This would result in all or a significant portion of 48 of the 108 Logical Timber Management Areas on the Forest not being entered. Only about 13,800 unroaded acres would be logged in the first decade. This should result in a good distribution of nongame species population centers. In addition to the Logical Timber Management Areas where entries are not projected for 50 years, 70 percent of the suitable timber acres would not be entered in the first decade.

Livestock grazing activities will continue in most of these areas, thus some influences of man will continue to occur.

11-45

The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the Canyon, but to all unauthorized entry including recreational hiking. Since the closure was enacted, a study of the Canyon prepared by the Museum of Northern Arizona [Riparian Ecology of the San Francisco River; Carothers, Steven W. et al., 1982] indicated that at that time, the Black Hawk was not nesting in the Main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the river is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also stated "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

We agree that the statement in the DEIS that you reference cannot be substantiated with quantifiable data and as a result, is too strong. The statement has been modified to read "There is no evidence indicating that the limited ORV use of the canyon is causing unacceptable resource damage." The study of the canyon mentioned above did suggest that the ORV use of the

Riparian Areas In view of the high ecological value of riparian area, we are disappointed at the relatively low level of management attention they are given in the draft Plan. Far more could be done to protect and restore riparian environments. The level of protection described for Alternative F shows what is possible. We recommend revision of the draft Plan to incorporate a riparian-area protection program at least as strong as that in Alternative F. We believe the following specific guidelines for protection of riparian areas should be included in the final Forest Plan: 1) road construction will be avoided in riparian areas; 2) At a minimum, no timber harvest will take place within 100 feet of riparian zone; 3) Grazing in riparian zones will be restricted to limited, short-duration grazing intended to achieve specific wildlife management objectives. All other grazing will be phased out consistent with an accelerated schedule for installation of protection fencing; and 4) recreational use of riparian zones will be monitored and maintained at levels that are not damaging to resident wildlife or other riparian-dependent resources.

Riparian areas are extremely important for wildlife. In the riparian zone, more than anywhere else in the forest, the operating principle should be protection of soil, water, vegetation, wildlife and fish resources first, recreation, grazing, timber, and other interests second. The Forest Service has the opportunity to improve the condition of riparian areas on the Gila significantly. With the current draft Forest Plan, it is missing that opportunity.

ROAD CONSTRUCTION

Roads are one of the primary causes of erosion in New Mexico. They contribute sediment to streams in forested watersheds. Roads can disrupt seasonal and daily migrations of wildlife and can act as corridors for the dispersal of non-native plant species. Poorly engineered roads can result in mass wasting and visual scars on the landscape that may last for centuries. Roads reduce wildlife cover and forage and may increase poaching. No logging road should be built through creeks rather the building of small bridges should be required.

Road construction will cost X \$ per thousand cubic feet of timber. Adding maintenance costs to this and considering the bids being received for timber today, these costs should be significant in the determination of a suitable timber base. Are new roads economically justifiable? Road construction should no longer be subsidized by the public sector when the primary use is for timber sales.

canyon may cause erosion of the river benches. This conclusion was made by the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly effected the natural erosion rates.

Based on the available data, we do not find any resource reason to continue the seasonal closure. The ORV use in the canyon actually peaked at a use level of 1184 recreation visitor days in 1980. Since that time the trend appears to be down. The 1983 data [latest compiled data] indicated a motorized use level of 438 recreation visitor days. Much of this use occurs in the upper portion of the canyon.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon a decision has been made to close the portion of the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

11-46

We agree that riparian habitats are extremely important. We have reviewed your suggested standards and guidelines. To clarify our management objectives, the following modified versions have been added to the Forest Wide Standards and Guidelines.

When possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted in such a manner as to provide for the protection of these key areas.

Grazing in riparian zones will be managed toward providing for maintenance and improvement of these important areas.

When possible, recreational use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

The changes in the Proposed Action Alternative are expected to result in an increase in riparian habitat condition over time but the increase will still not be at the level proposed in Alternative F. Due to the multiple use goals in the Proposed Action Alternative and the associated budget constraints, it is not possible to attain those accelerated levels of riparian management. Riparian condition is a major concern on the Forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

11-47

It is standard practice to install culverts or small bridges at drainage crossings for all roads that are constructed.

11-48

Road costs are included in the planning analysis and as a result do effect suitability determination. It is important to understand, however, that areas do not require a positive present net value in order to be called suitable for timber. The timber suitability analysis begins by defining

those areas of the Forest that are biologically suitable and have not been legislatively withdrawn from timber production. These areas are called tentatively suitable lands. The tentatively suitable areas include areas that are not legislatively withdrawn, areas where technology is available to ensure timber production without irreversible resource damage, and areas where there is reasonable assurance that the area can be adequately restocked. Once these areas are defined, costs and outputs are developed for them. This is where the road costs associated with timber activities are defined.

The economic aspect of the timber suitability analysis comes when alternatives are generated. Costs and outputs were included in the FORPLAN model for a variety of management options. Alternative goals are then formulated and a FORPLAN run is structured to accomplish these goals. The FORPLAN model (a linear programming model) assures that the goals are met in the most cost effective manner. As a result, the lands that are selected for timber management become the suitable timber acres for that particular alternative. This process complies with the Forest Planning Regulations [36CFR 219.14 (c)]. These regulations state that lands are not suitable if:

The lands are not cost-efficient, over the planning horizon, in meeting Forest objectives, which include timber production.

It is important to note that nothing in the regulations state that the areas selected for timber require a positive present value in order to be called suitable. Areas defined as suitable need only be the most cost effective in meeting the goals of the alternative. In other words, they should be those areas where the benefits are highest relative to the costs.

In addition to your concern regarding timber suitability you asked if new roads are economically justifiable. There are areas on the Forest where the timber volumes per acre and associated benefits are high enough, that even with the reduced timber benefit values used in the modified Proposed Action Alternative, timber harvest (including new road construction) will result in higher benefits than the associated costs. Road costs and timber benefits, however, cannot be singled out as the only costs and benefits to these areas. The economic analysis done as part of the planning process includes all costs and all benefits associated with managing an area for a combination of benefits. In other words, the analysis considers not only road costs but all other timber related costs including costs necessary to protect the environment and provide benefits for other resources. As a result, all resources that benefit are included. For example when timber is cut, additional forage is produced that can be used by wildlife or domestic cattle.

When considering costs and benefits, no single cost should be considered without considering the other costs and benefits in relation to the goals of the alternative. For example, the modified Proposed Action Alternative does propose to log in some areas that do not always provide economic benefits that are greater than costs. These areas are the most cost effective in meeting the goals of the alternative. These goals may include maintaining communities and a viable timber industry, as well as protecting some of the unroaded areas from development in the first decade. Providing habitat for game and non-game wildlife is another goal. The goal of maintaining some of the unroaded areas for semi-primitive recreation, for example, results in logging some less efficient areas as did the goal of not logging more than 5 MMBF of cable volume in the first decade. The increase in trail maintenance funds reduced the PNW of the modified Proposed Action Alternative, but it contributed to the goal of maintaining dispersed recreation opportunities and improving experience levels. Because forest resources are interrelated, all costs and benefits and all alternative goals have to be considered in order to understand the allocation.

We must be ignorant but why does fire protection in the next 50 years require more roads than in the last 50 years especially now that there is a "let burn" understanding of the benefits of fire? The plan seems to be classifying roads and road expenses that subsidize the timber industry under fire protection and creating false benefits classified under fire protection to justify the timber industry subsidy

49

On page 229, (evaluation of roadways) the "2/ increase by 2030" is misleading. Construction of roads alters the environment and once there, a road is fairly permanent. "Net increases" are useless numbers for purposes of evaluation. What the public needs to know is the total new construction. Are reconstructions on roads that are still used or on roads that have been abandoned for 50 years? There is a big difference here with on the one hand the USFS discounts old roads with "net" numbers while on the other hand suggests that reconstructions are no big deal and separate reconstructions from new constructions

50

OFF ROAD VEHICLES

ORV's should be restricted to specific designated areas, damage should be monitored, and user fees should be charged, the fee to be used for habitat improvement and law enforcement

51

We were surprised to find only five areas (in addition to the wildernesses) with ORV closure or restriction. ORV negative impacts have to be considered and all ORV use banned when the forest floor is wet. The rule of thumb should be to close all riparian areas to ORV then only open an area if adequate request and justification allows

52

LAW ENFORCEMENT

There has to be more intensive patrol and a program to more vigorously carry out prosecutions where appropriate. Items P 24 and P 25 are not specific enough as to the mechanics of upgrading law enforcement. The goal of emphasizing personal contacts is excellent

53

11-49

We cannot find anywhere in the Plan where we stated that fire protection in the next 50 years requires more roads than in the last 50 years. Fire protection was not used as a reason to build roads. It is true, however, that increased accessibility does improve reaction time to fires. Even with the modified suppression policy, roads provide fire breaks that help accomplish fire management goals. We need to stress again, however, that fire protection needs were not a rationale to build roads.

11-50

We cannot find any reference to roads on page 229 of the draft Plan or Environmental Impact Statement. All road mileages in the DEIS were total miles of roads constructed and reconstructed. The final Environmental Impact statement lists net and gross miles to provide the reader with a better understanding of the number of miles that will be closed.

Reconstruction of roads shown in the Plan is generally reconstruction of roads that are either currently useable or that still appear as roads on the ground.

11-51

The Forest has the authority to close parts of the Forest to ORV use but we do not have the authority to charge user fees. The only exception is for organized activities where a special use permit would be required.

11-52

We do not feel that a ban on ORV use when the Forest floor is wet is a viable option. In order to do this a closure order would be required every time this condition occurred, and the order would have to be advertised. The logistics of doing this on a 3.3 million acre Forest with a variety of ground moisture conditions at any point in time would be very difficult.

Closing all riparian areas to ORV use and opening areas only by request would be equivalent to closing all riparian areas to hiking or any other use and only opening areas by request. There are a variety of uses that could adversely affect these areas as well as other areas on the Forest. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require closures, specific areas will be closed.

11-53

We disagree that standard and guideline P24 and P25 are not specific enough. Standards and guidelines more specific than these would reduce flexibility and would not allow for change in the program that is often needed to react to the ever changing law enforcement problems on the Forest.

Law enforcement activities continue to increase on the Forest. We agree that a more intensive law enforcement program Forest would be ideal but with staffing and budget constraints we must continue to balance law enforcement with our other Forest management objectives. We will continue to place a high emphasis on enforcement of cultural resource laws and theft of government property [including fuelwood]. We have had some major convictions relating to theft of cultural resources in the past few years. We will continue to increase law enforcement as resource protection needs rise, but it is important to note that not even the highest level of law enforcement activity will totally eliminate crime.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

MONITORING

This category has to be the most important aspect of the plan. Such a program needs to spell out exactly how the managers must react if a part of the plan seems to be failing and to bring future revisions of the plan into a more proper perspective. The plan has budgeted inadequate funds for proper monitoring and needs to be adjusted. Why weren't plant indicator species also included in the plan? They should be.

54

55

WATER SHED

A concern about the plan is if that water yield (quantity) is more adequately addressed than is water quality.

There is abundant evidence that activities conducted during timber harvest can degrade water quality. These include road building, skidding, landing, and site preparation. The only way to determine if Best Management Practices are working is to monitor water quality.

56

Intensive timber management with herbicide ties directly into water pollution problems.

11-54

The monitoring plan has been revised. The new monitoring plan does not contain the estimated costs that were included in the Draft Forest Plan. The revised monitoring plan will include actions, effects or resources to be monitored, the units of measure, the data sources, the intent, the precision/frequency, the reliability, and the variability which would initiate evaluation. The costs to accomplish monitoring activities are included in the total Forest Plan budget.

11-55

The planning regulations [36CFR 219.19] state that in the selection of management indicator species the following categories should be represented where appropriate:

Endangered and threatened plant and animal species....; species with special habitat needs that may be influenced significantly by planned management programs; species commonly hunted, fished, or trapped; non-game species of special interest; and additional plant or animal species selected because their population changed are believed to indicate the effects of management activities on other species of selected major biological communities or on water quality.

Since the purpose of management indicator species is to estimate the effects of each alternative on wildlife and fish populations, Forest personnel selected wildlife and fish species as indicator species. Plant species that indicated a change in habitats could have been used but we felt that in most cases, animal species provide more reliable indicators. Threatened and endangered plants that exist on the Forest are often not good indicators of changes in the major biological communities. As a result they were not selected. This does not mean, however, that management will not reflect a concern for the types of environments needed to maintain these plants. Like federally endangered animals, federally endangered plants are covered under the Endangered Species Act. We will comply to the mandates of this Act. We will also continue to manage to protect those species on the Region 3 sensitive species list which includes many of the plants listed as threatened in the State.

11-56

We agree that there is abundant evidence that activities conducted during timber harvest can degrade water quality. There is also a considerable amount of research that indicates that if Best Management Practices are used, the detrimental effects on water quality can be minimized. As a result we do not feel that it is necessary to institute an expensive and time consuming program to monitor water quality. This would be very difficult and costly on a Forest like the Gila where many of the drainages within timber sale areas are not perennial streams.

The effects of herbicide on water quality are controlled by using the manufacturer's label recommended rates and by understanding label precautions. This information is taken into consideration in planning for the application of the herbicide. For example, if the label specifies that the chemical can be carried into streams, the project is designed to avoid herbicide use in close proximity to streams or during periods where surface flow could be expected due to heavy rains.

Herbicides are only applied under the supervision of a certified pesticide applicator. This certification is done by the Regional Integrated Pest Management Working Group in conjunction with the State of N.M. Before any herbicide project is approved, it is reviewed by either the Forest or the Regional Pesticide Committee. These reviewers consider the potential effects on other resources and all alternatives to the project before they recommend approval. This process assures that water quality standards do not fall below State water quality standards.

HANDLING OF PROPOSED CONNOR DAM

According to Dr. Lee Brown, water resource economist at UNM, water from the proposed Connor Dam is being considered for purchase by Silver City for \$600.00 an acre foot. This is an unrealistic price for municipal use, let alone agricultural use. We believe the proposed dam is not viable not only for economic reasons but for many major environmental reasons including threats to some potentially endangered species. Thus, we are opposed to the withdrawal in management area 7A of the 4,120 acres for power site reserve and the 240 acres for water power designation.

57

CONSULTATION

We would like to complement the Forest Service for its extensive parameter of consultation (vide pages 184-186 in DEIS). While the contact was excellent, we would like to recommend for future consultation the In-Stream Flow Group in Salt Lake City and the Western Energy and Land Use Team of the U.S. Fish and Wildlife in Ft. Collins. In particular, we would like to complement the co-ordination with the U.S. Fish and Wildlife's Habitat Evaluation Procedures.

Was the Bruce Hayward report utilized in making the non-wilderness decision for the Lower San Francisco area? If not, that was a gloss.

58

MISC. STATEMENTS in CONCLUSION

Congress in 1960 (June 12) directed the National Forests be managed under the principles of multiple use of the land and sustained yield of renewable resources, based on the public's continuing needs for water, wood, wildlife, recreation, and forage. The increasing complexity of a developed nation and the impact of development and population upon natural systems demands a scientific approach to management of National Forests. The best business/management approaches possible should be used to implement the management plan being molded to implement non scientific goals and production quotas.

59

Through the plan, wildlife is indiscriminately discussed, evaluated, and used in conjunction with other terms (i.e. game, recreation) rather than given independent status and evaluation as required by the 1960 Act. It is fair, good, and necessary to evaluate recreation with a wildlife component, however wildlife analysis must include all wildlife not just game. In this proposed plan the USFS evaluates wildlife (p. 19) in terms of MRVDS. One cannot recall in any scientific journal where a biologist evaluates living organisms and their required ecosystem in MRVDS.

60

MRVDS are a valid measure of recreation, not wildlife. It should be noted that recreation and wildlife are separate categories. The word improvement is used incorrectly when referring to habitat diversity and carrying capacity. There is no scientific basis for making the statement that the alternative proposed improves wildlife habitat diversity. The proposed alternative increases wildlife habitat diversity. This may benefit some species and as well will be detrimental to others. Specifically, it appears it will increase big game species and thus will be an improvement in big game habitat. This indicates a lack of scientific evaluation on behalf of the USFS with regards to wildlife. A serious deficiency for such a professional organization.

Specifically, wildlife should not be evaluated in conjunction with recreation. Recreation of necessity (and logically) should have a wildlife category since some recreation (i.e. hunting and birdwatching) directly depends on and is thus related to wildlife. The 1960's Act does not limit wildlife to only that involved in recreation (and thus MRVDS). Logically, wildlife is thus independent from recreation; however, the proposed plan consistently evaluates wildlife in terms of recreation (game). This is

11-57

The Bureau of Reclamation is the lead agency in the Connor dam study. We will respond to their Environmental Impact Statement when it becomes available for public review.

The power site reserve and the water power designation mentioned in the Plan were established by the Bureau of Reclamation. We have made a recommendation that the withdrawals be revoked. Since the withdrawals were established by another agency, recommendation for revocation is made to the agency in order to inform them that we have no management need for the withdrawal. The Bureau of Reclamation would have to make a recommendation to the Bureau of Land Management before the withdrawal would actually be eliminated.

11-58

The Bruce Hayward report was definitely considered in the analysis of the San Francisco River Area. All available data was considered in making our recommendation for the area.

11-59

We agree that scientific principles should be used in the management of Forest resources. In development of the Forest Plan we have used a combination of scientific principles and economic principles. Scientific principles of management were used to develop management prescriptions that would result in a variety of outputs. Inter-relationships between resources were a key consideration in the development and organization of the Forest planning data. Costs were evaluated to provide prescriptions that generated cost efficient combinations of various outputs. Prescriptions based on scientific principles, were then entered into an economic linear programming model to determine the most cost efficient combination of management practices needed to meet the goals of an alternative. The best scientific data available was used in the development of the Plan.

11-60

We agree that a management plan should attempt to evaluate wildlife considering species present, populations, and habitat requirements. That is the basic approach that was used in the Gila National Forest Plan.

The first step in developing wildlife data and wildlife relationship information for the Plan was to define indicator species. Utilizing the Forest's current inventory of vertebrate species, a tentative indicator species list was developed which approximated one or more of the following criteria:

Occurs commonly as a summer, winter, or yearlong resident.
Species distribution involves relatively large portion of the Forest.
Listed as a Game Species, a threatened or endangered species, or a regionally sensitive species.

The tentative indicator species list was reduced using the following criteria:

Species habitat requirements too broad. Species populations not sensitive to changes in successional stages of vegetation type on a detectable basis.

Species whose habitat requirements were not sufficiently defined to allow documentation of change or monitoring (provided known requirements could be addressed by an associated indicator species).

Species whose habitat requirements within a given vegetation type would be met by habitat needs of other selected species.

not a scientific approach as the public would expect from a professional agency such as the USFS.

A management plan must attempt to evaluate wildlife considering the following 1) species present, 2) populations, 3) habitat requirements such as diversity is not good in all species. How much continuous habitat is required to maintain a perpetually viable gene pool? Is the habitat available and utilized elsewhere in the county, state, nation? Are these habitats under perpetual public protection and if not the Gila lands have a greater value even if the habitat is common on adjacent private lands because private lands have no provision to remain as they are perpetually. The plan and modeling do not address wildlife habitats (for each known species) based on the above considerations. For example Bears- will increased roadways lead to increased poaching? This is now a big problem in California, North Western States, and the Smokey Mts, where the access to bear habitat is easy in 4 W drive, or Spotted Owl- potential of habitat destruction (likes thickly wooded canyons)

The plan and evaluation displays a woeful lack of understanding of natural system "management" and a complete failure to consider the existence of all wildlife (not just game) and the ecosystem to support them in perpetuity.

Comparison of priced timber and non priced non-game wildlife benefits by computer is beyond our comprehension (How could a computer pass judgement and decide the beauty of a person, artwork, or the value of a non-game wild bird?)

On page 19, what does "Increases in Threatened and Endangered habitat improvements would occur" mean? We can't find in the plan what T & E species will be helped by a 25% decrease in coniferous habitat and 25% decrease in watershed protection

On page 35, the statement that timber harvest improves wildlife habitat is false, inaccurate, misleading, and has no scientific standing. Accurately the statement should be, "Timber harvest improves big game habitat." This statement belongs under the heading "recreation" and not wildlife

Additional refinement included wildlife and fish species whose habitat requirements would address high, moderate, or low serial stages within each vegetative type represented.

After indicator species were developed, primary habitat components to be tracked were selected. The number of components that could be tracked were limited because of modeling considerations, but the final list was considered to be sufficient to project anticipated effects on indicator species. The habitat selected were old growth, cover, turkey roost habitats, squirrel habitats, and herbaceous forage and cover habitats. Even though some of these habitats were named for a specific species (turkey, squirrel) the characteristics of these habitats apply to the habitat requirements of other indicator species.

Quantities and distribution of primary habitat components necessary to maintain minimum viable populations of all indicator species were then defined. Distributions took into consideration the maintenance of viable gene pools. No alternative was developed that reduced habitat levels below the level necessary to maintain viable populations.

Once minimum viable population habitat levels were defined, prescriptions were developed that provided habitat level above the minimum level. Effects of other resource activities were integrated into prescriptions to project total management effects, costs, and outputs. (A copy of the wildlife section of the Outputs Technical Report has been provided to the Sierra Club. This describes this process in much more detail)

As can be seen from the above discussion, wildlife MRVDs were not the only parameter used in evaluation of habitat trends. Wildlife related RVDs were used as an economic indicator of the value of wildlife to provide the economic model with some basis to compare the value of wildlife to the value of other resource outputs. The RVD amounts were based on the assumption that where habitat and populations of big game, upland game, waterfowl, fish and nongame species change within a given area, there is a corresponding change in the attraction of associated wildlife recreation. The use of wildlife recreation along with these other habitat parameters is considered valid in projecting a picture of anticipated wildlife outputs. Effects on wildlife were evaluated by looking at changes in habitats and the effects of other resource activities and not simply by reviewing RVD levels.

You also had a concern related to the use of the term improvement in habitat diversity and carrying capacity. We have changed this terminology to increased habitat diversity and carrying capacity.

11-61

The improvements mentioned in the sentence that you reference on page 19 are project improvements specifically for T&E species. They are not related to the habitat reductions mentioned in the sentence above. They include things like stream structures for Gila Trout etc.

11-62

There is no statement on page 35 of the DEIS that says "timber harvest improves wildlife habitat". We disagree with the recommendation that if the statement were present it should read "Timber harvest improves big game habitat". The correct wording would be "Timber harvest increases habitats for species that utilize lower seral stage vegetation and more open stands".

The plan appears to revolve around the simplistic idea that increase in habitat diversity improves wildlife. Many wildlife species that may have a great "value index" due to low reproductive rates, low population state or nationwide, or inability to compete with invading species (who benefit from diversity) are harmed by diversity. (Review literature on maintenance of small isolated native populations confined to small "islands" of habitat resulting from increase in diversity.) Professionally and scientifically the USFS should be embarrassed by such simplistic wildlife evaluation statements.

63

"Can not be managed" criteria. If this was a valid criteria, there would be no USFS today. Undoubtedly there was little or no management when the national forests were established but fortunately the "can not be managed" excuse was not around then. Throughout the plan, the USFS has admitted an inability to manage and protect archeological sites, fuelwood, etc. (game poaching?) but that does not mean these items should be disposed of. The American public deserves a more reasonable and professional answer to situations rather than "can not be managed."

64

Law enforcement should address lack of USFS enforcement authority. This is recognized as an increasing problem throughout the document yet the proposed alternative asks for less emphasis on enforcement and protection.

On page 29, "continuing existing visual quality considerations" seem a false and misleading statement. Several sentences later the PA calls for a reduction in area of the visual quality class. If the PA calls for a reduction in timbered areas (compared to the current plan) that is not a continuation.

65

Baseline data should be collected before the plan is implemented. (i.e. the implementation of any forest plan should be delayed until baseline data is collected.) Scientifically, how did you produce a plan without the baseline data on wildlife that you are just now proposing to collect?

66

11-63

We agree that some wildlife species could be harmed if activities designed to increase diversity were to take place in island habitats and such habitats were adversely affected thereby. We are aware of some island habitats and some island populations of sensitive species occurring on the Gila National Forest. We will continue to attempt to identify and inventory island habitats and take appropriate actions to avoid damaging such areas while working to increase habitat diversity on the Forest. Should any special habitats be adversely affected by management activities, total diversity would be decreased, not increased, thereby defeating our purpose.

11-64

We disagree that the Proposed Action Alternative asks for less emphasis on enforcement and protection. Law enforcement activities on the Forest have increased in recent years and will continue to increase as needed.

We are also unable to find the statement "can not be managed" that you quote. We infer from your statement that you are again referring to law enforcement activities on the Forest. We feel that you have confused management of law enforcement efforts with elimination of crime. Law enforcement activities are being managed on the Forest and are increasing. In the last three years the Forest has qualified several new level 3 law enforcement officers. Last year 145 violation notices and 116 warnings were issued. In the last few years several major convictions involving cultural resource violations were obtained. We do not view this as a reduction in the law enforcement efforts or an inability to manage the program. Elimination of crime, however, is another issue. The finest law enforcement agencies in the country have not been able to eliminate crime. We have no reason to believe that we will be able to eliminate crime on the Forest. We will, however, continue to manage our law enforcement efforts with a goal of reducing crime on the Forest and protecting the Forest resources.

11-65

We agree that the statement "continuing existing visual quality considerations" is confusing. This section of the DEIS has been rewritten.

11-66

Existing wildlife data available on habitat requirements, populations, and interactions with other resource uses was utilized to address wildlife habitat relationships. Existing data from species/habitat surveys along with knowledge of key habitat areas were also used in this process.

We disagree that every aspect of baseline data must be collected prior to developing or implementing Forest Plans. We feel confident that there will always be needs identified for additional base data. If the Forest did not plan until baseline data was available for all resources, we would manage the Forest on a day to day basis and never develop integrated resource plans designed to address issues and resolve potential conflicts. This would be management by reaction and would not result in consideration of all resource values and uses.

We agree, however, that baseline data is important. The monitoring plan has been revised to put a high priority on gathering base data in areas where management actions are likely to result in habitat changes.

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

On page 52, "A determination as to whether a reduction in soil loss is worth more than an increase in timber harvest becomes a judgement based on values and priorities" Soil reduction should not be based on value dollars and priority dollars but rather on how long it takes the soil to be replaced. If our society today assigns a low value \$ or priority \$ to soil, there will be none in the future. That would be in violation of the legal requirements assigned to the USFS by Congress and an insult to common sense.

We object to the revocation of mineral withdrawals in developed campgrounds. Mineral exploration and development is not compatible with recreational use of campgrounds. Just as a drilling pad is off limits to a camper, a campground should be off limits to a mining company. The maintenance of a 1469 acre withdrawal from mineral entry, the acreage of campgrounds proposed for revocation of withdrawals, is not going to significantly impact our national self-sufficiency in minerals, the national debt, the economic well-being of a mineral company, or any other possible justification for revocation. We further object to management activity DOI in campgrounds, for esthetic and sanitary reasons, in addition to the fact that cattle are a nuisance and an annoyance to campers, and, at the very least, campgrounds should be off limits to cattle.

TABLE 1. TIMBER RECEIPTS AND EXPENDITURES ON THE GILA NATIONAL FOREST, 1979-1984

	Fiscal Year						Six Year Average
	1979	1980	1981	1982	1983	1984	
(Thousands of Dollars)							
Timber Receipts (1)							
Cash	1382	1810	185	145	699	921	857
Non-cash	431	1558	1142	259	485	248	687
Total	1813	3368	1327	404	1184	1169	1544
Timber Expenditures (2)							
Sale Preparation and Administration	575	477	597	617	703	781	625
Reforestation and Stand Improvement	344	336	348	406	218	370	337
Timber Road Construction	510	1592	1299	452	741	1055	942
Total	1429	2405	2244	1475	1662	2206	1904
Net Timber Receipts:	384	963	-917	-1071	-478	-1037	-359

Ratio of Timber Receipts to Expenditures	1.27	1.40	0.59	0.27	0.71	0.53	0.81

(Millions of Board Feet)							
Sawtimber							
Volume of Timber							
Offered	44.0	45.0	46.0	42.0	34.0	40.6	45.3
Sold	8.0	26.0	27.0	6.0	57.0	0.1	20.7
Harvested	25.0	29.0	9.0	7.0	15.0	16.8	17.0

11-67

We feel that your comment relating to page 52 is the result of a misunderstanding of what is intended. The statement you refer to, "A determination as to whether a reduction in soil loss is worth more than an increase in timber harvest becomes a judgement based on values and priorities" is included in the section on nonpriced benefits. The values and priorities mentioned are not \$ values and \$ priorities but are personal values and priorities. The statement was intended to explain that where nonpriced benefits are involved, allocations decisions cannot always be made based on the greatest dollar return. Judgement has to be used. This judgement, along with legal requirements, is why none of the alternatives propose management actions that would result in soil loss at a level that would reduce the productivity of an area.

11-68

The mineral withdrawals in campgrounds were established before Forest Service regulations to control surface disturbance were promulgated. As a result of these regulations, mineral operations that will result in surface disturbance now must be preceded by an approved operating plan. Operating plans provide for protection of surface resources to the extent possible under the regulations. Because of these controls and the fact that all areas recommended for revocation of withdrawals have very low potential for mineral activity, there is no need to maintain the withdrawals.

We agree that cattle use of campgrounds needs to be controlled. The standard and guideline to which you refer in the Developed Recreation Management Area, has been changed to read "Permit cattle grazing in campgrounds only during low use periods and when improvements will not be damaged".

LETTER 11

FOREST SERVICE RESPONSE TO LETTER 11

- (1) Timber receipts are the sum of cash and non cash receipts for harvested timber. This reflects the fact that only a portion of the timber harvested on national forests is exchanged for cash. The remainder is given to timber purchasers as payment for the construction of timber access roads. Such in kind payments are known as "purchaser road credits." Other roads are paid for with funds appropriated by Congress.
- (2) Timber expenditures are defined as follows: a) Sale Preparation and Administration - includes expenditures for sale preparation and administration, stand examination, timber salvage operations, and timber sale support; b) Reforestation and Stand Improvement - includes IV (a), Knutson-Vanderberg but not appropriated funds used for timber stand improvement and reforestation; c) Timber Road Construction - includes purchaser road credits, road construction, engineering support expenses and appropriated funds used for timber road construction.

SOURCE: U S Forest Service, Washington Office, March, 1985

Comments in regards the O'Toole report:

In reading the O'Toole report on the Gila Forest Plan, we have come to the following opinion as to its basic thrust. We interpret his comments to say:

The plan has many economic problems. Most importantly, planners failed to consider a variety of alternatives which could significantly improve the net public benefits produced by the Plan. For example,

--All alternatives placed the same number of acres in livestock grazing.

--All alternatives proposed logging on steep slopes and other areas which will reduce total revenues and returns to counties.

--Although 750,000 acres of roadless lands were inventoried in RARE II, no alternative considered dedicating roadless areas other than the two wilderness study areas to non-timber, recreation use.

The alternatives in the EIS focused on varying the budget, rather than the land base, to achieve various goals. For example, to produce high levels of wildlife the amenity alternative makes major investments in habitat improvement. Dedicating more land to wildlife habitat, rather than timber or grazing, might achieve the same results at a far lower cost.

Although the proposed alternative does not produce the highest level of timber harvest, it places the most amount of land in the suitable timber base -- nearly 98% of available acres. Many roadless areas, steep slopes, and other areas which are costly to manage for timber yet could provide high quality wildlife habitat and recreation areas are included. Yet a significant number of these acres are not even needed to maintain timber harvests at proposed first decade levels. Reducing the suitable timber base would significantly increase net public benefits and revenues to counties, while reducing costs, at essentially no cost to anyone.

We will let the report speak for itself especially in the assessments of over inflated timber and grazing revenue projections and under stated recreation revenue projections.

11-69

The CHEC report is addressed with the State of New Mexico comments [001].

69

LETTER 12

FOREST SERVICE RESPONSE TO LETTER 12

000n12

New Mexico Chapter
National Wild Turkey Federation
3908 Azalea
Las Cruces, NM 88005

October 7, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor, Gila
National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin:

This is to provide you with concerns of the New Mexico Chapter, National Wild Turkey Federation, Inc., relative to the Draft Environmental Impact Statement, Proposed Gila National Forest Plan.

The National Wild Turkey Federation (NMTF) is a nonprofit membership organization dedicated to the wise conservation and management of the American wild turkey as a valuable natural resource. Nationally, the NMTF membership exceeds 26,000 comprised of 38 state and 149 local chapters. In New Mexico we have 5 local chapters with 274 members. We are a very active, management-oriented organization.

Our primary concern is with the effects of Forest Service (FS) actions on wild turkey populations. However, we are concerned with the effects on other wildlife populations as well. We recognize and fully accept the multiple-use concept of natural resource management on FS lands and are aware of the requirements under which the FS must operate in meeting multiple-use objectives. We have attempted to analyze the subject EIS but its complexity and oftentimes contradictory statements and our lack of experience in EIS assessment has caused uncertainty as to whether we adequately analyzed all aspects relative to our concerns. With this in mind, however, we respectfully submit the following objective comments:

The construction of new roadways on FS lands has recently become a well-publicized, national issue. We are equally concerned with road management on the Gila National Forest (GNF). Past timber cutting and fuel wood operations have resulted in a myriad of roads readily accessible by off-road vehicles. Road closure attempts were cursory, at best. Each new travelway made more wildlife habitat readily accessible by hunters and poachers. This has resulted in less and less habitat being available to serve as refugia for wildlife species, particularly game animals.

It has been well demonstrated that road closures on FS lands result in increased protection for game species. Intensive road closure programs are in effect on most FS lands in the Southeast. This has proven not only beneficial to game animals but also offers an increased quality hunting experience as limited access, in effect, creates "mini-wilderness" areas.

The NMTF has been very involved in working with the FS and state wildlife management agencies in instituting effective road closure programs. We will continue these efforts in New Mexico.

12-1

Many of our publics expressed similar concerns relative to our planned road construction activities. In response to their comments as well as yours, we have reduced the planned timber harvest levels by 5 million board feet per year. This results in about a 58 percent reduction in planned local road construction mileage. It must be noted that even though we are constructing local roads, we also plan to close approximately 65 percent of these roads after the timber sale activity is complete.

LETTER 12

FOREST SERVICE RESPONSE TO LETTER 12

We recognize that timber harvest may not necessarily be detrimental to Merriam's turkey populations. While turkey research in New Mexico has been meager, studies in adjacent states have been conducted relative to habitat preferences and the effects of various timber management practices on Merriam's turkeys. MacDonald (1960-64) found cutover mixed conifer stands were preferred over virgin stands. Studies by Burget (1957), Hoffman (1962, 1968, 1973), Jonas (1966), Boeker and Scott (1969) and Phillips (1980) on turkey roosts in ponderosa pine forests indicated a preference for overmature, open-crowned ponderosa pine roost trees, eastern slopes and some tolerance to selective cutting. Phillips (1982) recommended the following criteria for the selection of potential roost sites:

- 1 Site location -- hillsides, benches, sides of canyons, and drainage bottoms
- 2 Basal area -- 90-150 sq ft/acre
- 3 Aspect -- eastern and northeastern aspects wherever possible
- 4 Summer range sites should be located within 1/2 mile of dependable water sources

Schemnitz et al (1985) found that selective cutting did not lower potential as roost sites nor did overmature trees have to be left as actual roost trees. It was suggested that a minimum residual basal area of 18 m²/ha with some sawlog-size trees (30 cm + diameter at breast height) should meet the minimum roost requirements. Clearcutting of large areas was described as the most adverse timber management practice. Selective cutting appeared to enhance brood rearing habitat by providing small, patchy openings rich in grass and forb cover.

Fuelwood management is very critical to turkey populations both from the standpoint of mast production as well as cover. Scott and Boeker (1975) found significant declines in turkey observations per distance traveled and total birds after pinyon-juniper removal. Phillips (1982) discouraged fuelwood sales in the pinyon-juniper association because of the mast value of the larger fruit bearing trees. He recommended that if control/removal be conducted, the areas be small in size (20 acres or less), narrow, not exceeding three to four chains in width, and that all junipers, 10 inches DBH or greater, be left. He further recommended that oak fuelwood sales be directed towards maintaining the viability of oak stands and cutting some areas in a manner that would increase mast production.

We further recognize that livestock grazing influences vegetative cover, composition and height but studies pertaining to the impact of grazing on Merriam's turkey welfare, production and survival are limited. Phillips (1982) in Arizona found heavy grazing to have a negative impact on poult production, and Reeves (1953) found that hens with poults favored ungazed, fenced enclosures for feeding activity. Schemnitz et al (1985) concluded that brood habitat preference was not affected by livestock grazing and that moderate seasonal grazing (1 cow/32 ha) was not detrimental to turkey brood-rearing habitat.

Range improvements, and water developments, are extremely important to turkey populations in the GNF. Because of limited free water, these developments are very important to turkey survivability. Phillips (1982) suggested that ideally, one dependable water source should be available per section within turkey range. Well spaced livestock waterings in the GNF are instrumental in maintaining well dispersed viable turkey populations.

12-2

While we have reduced the overall timber harvest levels as discussed above, we have retained some cable logging to compliment attainment of management objectives such as suggested by MacDonald (1960-1964) and others.

Our primary silvicultural management will be accomplished through the use of a shelterwood system. We are proposing small clear cuts or patch cuts in both Ponderosa pine and mixed conifer stands to provide additional openings within grass and forbs as you suggest. You can find additional information of our planned silviculture treatments in the Plan's Summary of Vegetation Management Practices.

12-3

Many of our management areas have standards and guidelines written to compliment turkey habitat needs. We believe we can further clarify our intentions and have taken your suggestion to incorporate your recommended management practices into the final Plan.

12-4

We agree that integration of livestock and wildlife management objectives is important. We feel our Plan provides for a good balance between the issues related to these resources. We will continue to fully integrate the needs of all wildlife and the needs of livestock in all our project designs.

LETTER 12

FOREST SERVICE RESPONSE TO LETTER 12

From a purely wildlife-oriented viewpoint the NWTF supports Alternative F for the following reasons

- 1 Decrease in timber and fuelwood harvest would result in a decrease in road construction
- 2 Closure of non-vital roads
- 3 Decreased grazing would result in increased forage production

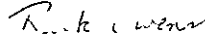
From a multiple-use viewpoint we may support Alternative FA with the following provisions

- 1 The status quo or increase in timber cutting could be accepted if selective cutting practices be maintained, turkey roost habitat requirements be given due consideration and an effective road closure system be instituted
- 2 The slight decrease in livestock numbers is acceptable. We request that this reduction be coupled with a rest-rotation grazing system for maximum habitat recovery. Emphasis should be placed on water development and maintenance
- 3 Fuelwood management should be closely monitored to minimize the detrimental effects on turkey populations

5

We sincerely appreciate the opportunity to provide these comments. We look forward to future interactions with you and your staff in working toward our wild turkey conservation and management objectives.

Sincerely,



Rick Owens, Chairman
Technical Committee

cc Roland Fife, President, NM-NWTF
Owen Lockwood, Public Affairs Committee, NM-NWTF
Dan Sutcliffe, New Mexico Department of Game and Fish

12-5

We have been sensitive to all public concerns on recommended changes to our original Proposed Action. Many of your reasons for liking Alternative F have been used to modify our proposal. We have decreased timber harvest and road construction. We have further clarified our intentions to close non-vital roads. Our range management objective remains one that will balance capacity with livestock and wildlife use. We appreciate your support for our proposal and look forward to our continuing opportunity to work together.

LETTER 13

FOREST SERVICE RESPONSE TO LETTER 13

OCT 10 '85

000-13

DATE RECEIVED

October 5, 1985

Mr. Kenneth Scoggins, Forest Supervisor
Gila National Forest
2601 North Silver Street
Silver City, New Mexico

Dear Mr. Scoggins

I am writing to express my objection to the proposed Gila National Forest Land Management Plan.

I object to the fact that Section 8, concerning means of determining grazing capacity, was completely ignored, and to the total disregard for the economic consequences to the permittee Federal land ranchers who have put generations of work and money into what they considered a sound business investment would be wiped out. We, as permittees, believe, as the Internal Revenue Service does, that our permits have value and that we have a right to continue our operations on Federal Lands. 1

I object also to the over emphasis on wildlife - wildlife and grazing are compatible - in fact it is a known fact that where there are no cattle there is no wildlife. 2

I did not like the implication that improvements would be allowed to decline intentionally, thus making grazing cuts unavoidable. There should be a plan to maintain improvements and funds and/or permittee help is available. 3

13-1

The "Section 8" to which you refer is the section associated with the Public Rangeland Improvement Act (PRIA). The PRIA legislation requires consultation with the permittees when allotment management plans are developed. The Forest Land Management Plan is not the same as an allotment management plan and as a result, Section 8 consultation is not appropriate.

Even though Section 8 consultation is not appropriate, public involvement activities mandated by the National Forest Management Act and the National Environmental Policy Act resulted in a considerable amount of permittee involvement during the Forest Planning process.

It has been and will continue to be our obligation to conduct appropriate Section 8 consultation during the development of all allotment management plans. A great deal of the success the Gila National Forest has had in dealing with grazing issues is due to a cooperative effort with permittees. Our intent is to continue working closely with permittees to assure the industry's continued viability while improving all resource conditions.

13-2

We disagree with your statement that the Proposed Forest Plan emphasized wildlife needs over livestock industry needs. Wildlife needs and livestock needs can to some degree, be compatible if proper management of the resource is undertaken. However, since both wildlife and cattle consume forage, a point of competition may eventually be reached. As a land management agency, we must plan ahead to avoid, or if necessary, resolve these types of conflicts.

It is true that in the Proposed Action Alternative, livestock numbers are projected to decrease and wildlife numbers are projected to increase. Two factors should be considered before reaching the conclusion that this is an emphasis on wildlife at the expense of livestock. First of all, with the existing improvements on the Forest, existing funding levels for range would result in the deterioration of improvements over time and the eventual substantial reduction in livestock capacity. The Proposed Action provides for the maintenance of many of these improvements and as a result, the existing capacity for livestock is actually expected to increase. It is not projected to increase to the existing permitted number level but it is still a higher emphasis on livestock than currently exists. Secondly, the long term projected wildlife/livestock forage use is projected to be a 29 percent utilization by wildlife and a 71 percent utilization for livestock. This level provides for an increase in forage available to wildlife but we do not feel that it is an over emphasis on wildlife.

In summary, the Proposed Action Alternative does increase the emphasis on wildlife, but it also increases the emphasis on range management. Under the Proposed Action Alternative, capacity for livestock is projected to increase approximately 10 percent over existing levels and permitted numbers are projected to decrease approximately 10 percent. [The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary from this level.] The permitted numbers that can be maintained in this Alternative are higher than those that would be able to be maintained if current management direction is continued. We feel that the Proposed Action Alternative results in a good balance of uses and will provide for a continued increase in the condition of the range resource on the Forest.

13-3

We did not intend to imply that "improvements would be allowed to decline intentionally", as you state. The statement to which you refer is merely an attempt to describe the possible consequences we face trying to maintain existing improvements under existing or declining budget scenarios.

LETTER 13

I was very much offended by the attitude expressed in the plan that the ranchers are the bad guys who over graze and cause deterioration of the resources. Nowhere did I see mentioned the fact that the permittee does indeed aid wildlife and does keep a watchful eye on the condition of the forest. In addition to this the grazing permittee is one user of the forest that makes a profit for the Forest Service. I think it is time that the rancher be recognized as a responsible, intelligent, and legitimate user of Federal Lands.

4

Thank you for considering my comments.

Sincerely,

Joyce W. Diebelle
Joyce W. Diebelle

cc- Ron Bradaby

FOREST SERVICE RESPONSE TO LETTER 13

13-4

It was not our intent to portray the ranchers as "bad guys" in the Plan or to infer that livestock grazing is not a legitimate use of the National Forest. We have worked with a group of permittees in developing the final planning documents and have made many wording changes that should help resolve your concern.

We disagree with your statement that "the grazing permittee is one user of the Forest that makes a profit for the Forest Service". Even though the Forest permittees pay to graze cattle on the Gila National Forest, costs to operate the grazing program on the Forest are higher than the amount collected from permittees.

LETTER 14

FOREST SERVICE RESPONSE TO LETTER 14

Forest Plan Response
to: Gila Forest Supervisor

NATIONAL FOREST
Gila National Forest
Gila Co. New Mexico

NOV 09 '85

000-14

Dear Mr. Scoggins

DATE RECEIVED

I write concerning the Proposed Gila Natl. Forest Plan. I read through the plan and the E.I.S., and it seemed thorough and reasonable for the most part. I do have some comments to make.

1. Petroleum exploration. Oil and gas wells are great polluters of water tables, and must be kept off of Forest land. To insure good waters in our public lands, we must not allow these wells on private lands on watersheds that enter the public lands. Large quantities of chemicals, fuels, oils, detergents, and brine are handled in a haphazard manner, very much a danger to the environment. The road systems to support pipelines and wellsites are extensive.

2. Mining. Mines operating within or on public lands are a source of water pollution due to processing chemicals, waste material, and fuels and oil from heavy machinery, and are a source of yet more roads. I recommend the Government buy out all valid mining claims within public lands, and prevent operations on any watershed flowing into the forest. I ask that no further claims be granted on forest lands.

We need strict monitoring and controls on any mining or petroleum exploration activities near or within the forest.

3. Herbicides and Poisons. I am opposed to the use of any herbicide or poison on public lands. The poisoning of streams by the Fish and Game dept. (for introduction of native fish species) is environmentally negligent. Putting toxins in water is an unacceptable practice, no matter what the goal.

Pelletized herbicide (to control tree invasion) presents a hazard to birds and small animals, that DO eat them, and these sickened animals are then eaten by predators, passing the toxins along the food chain. I suggest hypo-hatchet application and increased reliance on prescribed burns to control brush.

3.(cont) The use of heavy equipment to furrow land for planting trees and the use of herbicides to create a dead strip are useless to the planted tree, erosive, and dangerous to the environment. Spraying herbicides around older tree plantings is a potential danger to grazing animals and to nearby water-courses. Poisons of any sort are an environmental dead end. We must use them with extreme restraint.

14-1

We appreciate your concerns and opinions related to the oil/gas and mining industries. It must be remembered that these companies have the right under the 1872 Mining Law to explore and develop mineral resources.

However, before any action by these companies is initiated they must submit operating plans to the Forest Service for approval. Operating plans provide for protection of surface resources. In addition, many of our environmentally sensitive areas are actually withdrawn from mineral entry or have controls on surface occupancy. We often require performance bonds from these companies to assure that reclamation of their activities will be accomplished. Additional information on this issue can be found in the DEIS pages 114-116.

14-2

We agree that the use of herbicides and poisons in project implementation must be carefully considered. We never use these substances without a comprehensive environmental analysis of potential consequences. We cannot speak for the Fish and Game Department's use of these substances as they are a State of New Mexico Agency. We agree that we need to use prescribed fire more often to meet our resource objectives, but we have found in our experience that herbicides, etc. when properly used, can be a valuable management tool. Current Regional and National policies on the use of these substances is very restrictive and you can be assured we will not use chemicals in an indiscriminate manner.

4. Trapping and Hunting. Trapping is very disruptive on the numerical balances of predator and prey. I believe that this practice must end, both for the preservation of certain wild animals and for humane considerations. If trapping is stopped, the financial impact on the trappers of this state would be far less than they would have us believe. Let them find a less destructive diversion, perhaps some honest work.

Hunting, while more sporting than trapping, also needs some better controls. I have seen many hunters this year hunting on three and four-wheeled "all terrain vehicles", ATV's. This should be stopped. Road hunting is the rage for the four wheel drive crowd, and they find many miles of old logging roads to hunt from. I favor road closures to prevent these kinds of abuses.

I ask that the hunting of waterfowl and gamebirds (and all birds) be severely curtailed on public lands. These species are very important to the ecological health of the land. They are hunted unmercifully on private lands, and need refuge on our public lands.

I wish to see the forest as a preserve for all wildlife. I urge the Forest Service to be more pro-wildlife, and make management choices to favor the natural environment. Timber, range, and recreation must take a back seat to the interests of preserving the ecological health and genetic diversity of the forests.

5. Range & Grazing Practices. The Forest Service should be more strict with grazing-lease holders who manage their land poorly. Many leases have areas which are severely overgrazed, with resultant heavy erosion. The poor condition of many of our watersheds is the primary cause of the severe flooding we have experienced in Catron County in recent years. In many areas, the riparian zones in the canyon bottoms are completely destroyed through grazing too heavily. I oppose any plan which increases livestock concentrations in riparian zones or upper watersheds. As these areas contain a higher proportion of species of plant and animals, and are vital to the water retention and quality of the water, these need special protection from livestock.

I realize that the Forest Service has cut back herd numbers on some allotments. I have seen some areas improve these past few years, due to reduced herds, rotational grazing, and rest periods. As ranchers accept better grazing practices and gain a sense of land stewardship, much of our rangeland's lost potential can be regained. A leaseholder with good knowledge and ability can be a real asset to the Forest Service, as he oversees the ecological health of his allotment.

14-3

We appreciate your concern for wildlife. We have tried very hard to integrate wildlife concerns into all of our resource management decisions. You must realize that our management activities are often balanced to meet several management objectives simultaneously. A good example is the use of timber harvesting to improve wildlife habitat, to improve timber stand health, to control timber diseases, to reduce fire hazards, to improve wildlife/livestock forage, to furnish timber products to the public, and so on.

The questions you raise relating to controlling hunting and trapping are beyond the scope of authority of this agency. State Game and Fish Departments are responsible for managing those activities. We cooperate and work with them and often try to influence their decision; but ultimately the State Game Department make the decisions.

14-4

We agree that the grazing issue is an important issue to resolve. It must be remembered that livestock grazing is a legitimate use of the national forests as mandated by the Multiple Use Sustained Yield Act. We have been successful in accomplishing our range management objectives over the last 10 years. Our goal is to continue this effort as fast as funding will allow. You are correct in your statement that responsible ranchers can be excellent stewards of the land. Our joint efforts with the permittees has been a major factor in recent successes.

6. Timber Harvest. I recommend that timber harvest be held at some percentage below sustained yield. Natural systems should be allowed some surplus to prevent soil depletion, and be given more time between logging disruptions. Logging operations are devastating to the land, and much care must be taken to return the land to health. Second and third seedings of grass should be made where the first fails to take hold. Erosion controls are sometimes needed where skidding operations have destroyed portions of the stream channels. After a period of public fuel-wood use, all roads should be closed into these logged areas, except as needed for access by foresters or ranchers. Barricades should be constructed at frequent intervals and at every spur intersection. These are easily removed when the road is to be reopened for the next timber harvest. The barricades should be large and long enough to prevent any vehicle from going around it, (as is often the case). I favor any road closures into sensitive areas. I also favor the policy of reconstruction of roads out of canyon bottoms to protect riparian zones. Abandoned roads should be barricaded and seeded to reclaim them.

7. All Terrain Vehicles, 3 & 4 wheeled vehicles with wide tires, present a threat to all wildlife and vegetation when misused. I have seen several open areas literally covered with ATV tracks, a forestland racetrack. Hunters are using them in increasing numbers. Any kill from an ATV is a crime to the sport of hunting. I have seen people chase elk herds with these machines on more than one occasion.

I realize the potential use these could have to foresters, but the general public is misusing them as a rule, causing much damage and disruption of wildlife. I ask for strict prohibition of off-road activity and misuse of any motorized vehicles on forest land. Offender's vehicles should be confiscated. Signs should warn people to stay on the road in areas where abuses have been noticed.

Motorizing our forest would be a severe blow to it both ecologically and aesthetically. No person can appreciate nature riding a vehicle, I believe. The statement in the Forest Plan (Pg. 10 para. 6) that off-road use of vehicles could become a primary use of the forest is totally unacceptable. No one should be allowed to so degrade our wilds.

I am opposed to logging roads being left open for the interests of recreation. People should not be able to drive to any ridge or canyon that suits their fancy. This denies both driver and hiker of a "quality experience".

14-5

We have received many comments sharing your concern regarding future road construction activities. In response, we have reduced scheduled timber harvest levels by 5 million board feet per year. This results in over a 56 percent reduction in local road construction mileage. It must be noted that of the local roads constructed or reconstructed for timber activities, approximately 65 percent will be closed after the timber sale activity is complete. We welcome your suggestions for barricades, seeding, etc. and wish to inform you that we already employ all of your suggestions to mitigate timber harvesting activities.

14-6

The management philosophy on the Forest has been and continues to be one of imposing ORV regulations, where needed, to protect and manage forest resources while providing as much freedom to forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require additional closures, specific uses will be managed by closing areas or restricting ORV use.

The statement in the Forest Plan to which you refer is not a statement of planned policy. That sentence is located in a Summary of the Existing Management Situation and merely reflects our opinion that the demand for ORV recreation opportunity is expected to continue to increase.

LETTER 14

FOREST SERVICE RESPONSE TO LETTER 14

8. Wilderness Proposals. I recommend the Hell's Hole and Lower San Francisco Areas be designated as wilderness. These beautiful areas deserve our protection. I do not think that we have enough wilderness acreage, and I welcome more.

7

9 Proliferation of electric transmission line routes I was against the T G & E. power lines through the western part of Catron Co , and I oppose E.P. Electric's new line through the San Augustine. I hope the incursion of industrial right-of-ways of public lands can be held to a minimum

8

10 Acid Rain. I would like to see close monitoring of acid rain level and it's effects. This should be done by competent government personnel. The government must get strict pollution controls on American and Mexican smelters. I believe this to be a real threat to our timber resource.

9

11 Water Quality is in trouble throughout our forests There are more people using our forests, and a lot of them have no idea how to treat a stream and keep it clean. I suggest more education for the public through signs in watered campgrounds, & pamphlets, and monitoring of water quality in high use areas.

10

Another danger to water quality is from leaking fuel storage tanks, both above and below ground, (as at Apache Creek). I ask that the numbers of fuel storage tanks be limited on private lands surrounded by forest; and that all tanks on or above forest watersheds be periodically pressure tested by the government.

To close, I hope the managers of timber, range, wildlife, and recreation can work closely together in the future to achieve true multiple use. I hope the Forest Service will realize how important the wildlife aspect of forestry is, and always hold policies that favor wildlife, even at the expense of a percentage of timber or grazing AUMs. I ask that our forest lands be treated with care and restraint when we remove resources. The forest is not a factory to supply us with

14-7

We have reviewed our non-wilderness recommendation in the two wilderness study areas and continue to feel that the recommendation is included in the Proposed Action Alternative Summary of change located in the front of the Public Comment document.

14-8

Electric transmission lines are a legitimate use of the National Forest lands as mandated by Congress. We attempt to minimize their impacts by routing them through areas of lower environmental sensitivity and adopting appropriate site specific mitigation measures.

14-9

We agree that the acid rain issue is an important one. However, this issue is beyond the realm of authority of the Gila National Forest. The Forest Service is continuing to help resolve this issue as cooperators at the national level.

14-10

We agree that water quality is an important issue. We have adopted many best management practices (BMP) for each of our management activities. These BMP's are intended to achieve and assure a water quality standard that meets or exceeds all required State standards. We will continue to monitor and inspect all fuel storage tanks that are within our jurisdictional control.

LETTER 14

FOREST SERVICE RESPONSE TO LETTER 14

quotas of goods, it is a living organism that requires care to keep from harming it. Finally, I ask that roads be always limited in the forest, to help it resist the abuses of a large part of the public that will not walk and know the land.

I realize the effort that went into the EIS and the Proposed Forest Plan; and I know that there are personnel of talent and dedication working for the Forest Service.

Thank you for the opportunity you have given me to comment.

Sincerely,

Randall S. Greenwood

Box 12

Aragon, N. M.

87820

14-11

We appreciate your support of our efforts. The planning process the Forest Service has undertaken during the last few years is the most comprehensive planning effort ever undertaken by a Federal agency. As a result, we have learned a great deal about our resource and our users. We also recognize that it is not perfect, but we are hopeful the continued interest and support of our publics will help us to improve our Plan as we move toward implementation.

LETTER 15

FOREST SERVICE RESPONSE TO LETTER 15

000-15

Oct. 5, 1985

Oct 09 '85
DATE RECEIVED

Concerning the Gila National Forest Proposed Plan

It is very hard for us to understand the plan, but we get the general idea of it from what we have heard at the meetings

Our allotment is not being cut at this time, but we understand wildlife will be increased by 70%. How it will be done we don't know. We have lived here all our lives and have done fine, except for the last few years we have gotten lots more elk. We have developed springs, piped it out to tanks, put out salt, fixed fences, we have had trouble with hunters driving all over the place and leaving gates open etc. But we have managed to get along and even helped some of the hunters, getting lost or getting stuck. Now this 70% more wildlife will effect us we don't know, except we can see that our permit would be cut in order to have more deer and elk. If we are cut this will be the end of our ranching, although we get social security we won't be able to make it. We thank you for doing all you can to help us.

Billy T. Carney
Pauline Carney

15-1

The Forest Plan and the DEIS address the management emphasis for a given area. It projects outputs in future years based on the Forest's ability to resolve issues and management concerns. Adjustments in permitted livestock numbers and wildlife habitat will be accomplished through specific project plans developed within the Forest Plan guidelines. The final Plan addresses the projected level of wildlife by species and a listing of habitat improvements. It is not a direct relationship between improved habitat and wildlife numbers. Other limiting factors may come into play. We appreciate your concern and assure you that we will work with you and the New Mexico Game and Fish Department to sustain the populations of livestock and wildlife proposed in the Plan.

15-2

Based on our projections, the emphasis on wildlife and livestock are within the Forest's capability to support and sustain on a long term basis. Monitoring of the forage resource will in time, help us refine our management allocation between uses competing for a limited resource.

000-16

FOREST SUPERVISOR
 GILA NATIONAL FOREST
 2610 NORTH SILVER STREET
 SILVER CITY, NEW MEXICO

RECEIVED
 JUN 19 1985
 DATE RECEIVED

DEAR SIR:

AS CONCERNS THE GILA NATIONAL FOREST
 DRAFT PLAN AND ENVIRONMENTAL IMPACT
 STATEMENT, I WISH TO MAKE THE FOLLOWING
 REMARKS.

WHY WAS ALTERNATIVE F NOT SELECTED?
 AS IT SEEMS TO BE THE MOST ENVIRON-
 MENTAL SOUND ALTERNATIVE, IN ADDITION TO
 BEING ECONOMICAL, IT SEEMS A PITY AND
 A SHAME NOT TO USE IT.

THERE WERE 2 WILDERNESS STUDY AREAS
 NOT RECOMMENDED FOR WILDERNESS STATUS.
 IS NOT LIMITED USE OF SUCH AREAS THE
 BEST WAY TO PRESERVE THEM FOR FUTURE
 GENERATIONS? IN THE SAME VEIN OF THOUGHT,
 WHY NOT SET ASIDE ROADLESS AREAS TO
 PRESERVE POSSIBLE WILDERNESS AREAS. IT
 IS AMAZING HOW MUCH DAMAGE ROADS AND
 THEIR USERS DO TO AN AREA. SHOW ME ONE
 ROAD THAT DOESN'T BEAR THE SCARS OF
 THOUGHTLESS TRAVELERS, SUCH AS EMPTY
 ALUMINUM CANS TOSSED CARELESSLY OUT A
 WINDOW.

016-1

Alternative F, as stated, has the highest PMV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F does the best at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Preferred Alternative addresses both the amenity and commodity issues identified at the beginning of the planning process and provides the best balance of outputs (both commodity and amenity) within the identified budget limits. We feel that the modified Proposed Action Alternative provides a higher level of net public benefits than Alternative F.

016-2

We reconsidered our nonwilderness recommendation of the two Wilderness Study Areas between the draft and final Plan, and feel that the nonwilderness recommendation is the correct recommendation at this time. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary located at the beginning of this document for a more detailed discussion of this recommendation.

016-3

We agree that some of the unroaded areas on the Forest should be managed to maintain their semi-primitive recreation opportunities. Areas that are unroaded when the plan is revised in 10 to 15 years will be considered for wilderness.

In 1980, when the New Mexico Wilderness Act was passed, the Gila had approximately 753,195 acres of undeveloped area (not including Wilderness and Primitive Area). The New Mexico Wilderness Act designated approximately 39,275 undeveloped acres Wilderness and released approximately 5,705 acres that were previously classified as Primitive. Since 1980, 22,610 acres have been developed. This leaves approximately 699,000 acres of unroaded area on the Forest (including the two wilderness study areas). Chapter 4 of the Environmental impact statement has been amended to show the effects of all of the alternatives on the 699,000 undeveloped area outside of classified wilderness. Also refer to the Undeveloped Area section of the Proposed Action Changes Summary at the beginning of this document.

USE OF THE LAND THESE DAYS SEEMS
TO BE AIMED MORE AND MORE AT THE
BEST WAYS TO PROVIDE EASY PROFITS FOR
LOGGING AND MINERALS INDUSTRIES. WHAT
MAKES THESE PEOPLE SO SPECIAL AS TO
DESERVE "FREE REIN" TO EXPLOIT OUR
NATURAL RESOURCES. THEY CAN NEVER ADEQUATELY
REPLACE WHAT THEY HAVE TAKEN. THE MINING
INDUSTRY IS ESPECIALLY GUILTY OF THIS. THEIR
"RECLAIMED" AREAS OF NEW MEXICO, INSTEAD
OF LOOKING LIKE THE UNDISTURBED LAND, BEAR
A DISTINCT RESEMBLANCE TO THE ROLLING HILLS
OF THE MIDWEST. BUT THIS IS NEW MEXICO!

NOW WE COME TO THE QUESTION OF PROTECTION
OF WILDLIFE. GAME ANIMALS HAVE SOME PROTECTION
BASICALLY BECAUSE THEY ARE UTILIZED IN GENERAL
AS "CROPS" TO BE GROWN AND HARVESTED BUT
CONSIDER NON-GAME WILDLIFE. WE, AS A HUMAN

016-4

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative propose an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

We also appreciate your concerns and opinions as they relate to the mining industries. However, it is important to point out that these companies have the right under the 1872 Mining Law and the leasing laws to explore and develop mineral resources.

Before any action by these companies is initiated, they must submit operating plans to the Forest Service for approval. Operating plans provide for the protection of surface resources. We often require performance bonds from these companies to assure that reclamation of their activities will be accomplished. Additional information on this issue can be found in the Draft Environmental Impact Statement, pages 114-116.

016-5

We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous forest habitats are maintained at a level that compliments the forage habitats. Old growth habitat is projected to decrease by only 12 percent if the Plan were implemented for a full 50 years. Game species may appear to be solely emphasized. Because of availability of data, specific game species were selected for tracking. This does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species are represented by the indicator species selected. Specific management practices for nongame species (the exception is T&E species) are not developed because of the vast number of species that exist and the magnitude of information that would be required to track them. Effects of management activities on game and nongame indicator species will be monitored.

LETTER 16

POPULATION HAVE SO MISSED THE NATURAL
 WORLD AND UPSET THE NATURAL BALANCE
 OF LIFE, THAT MAYBE IT CAN NEVER BE
 WHOLLY RESTORED. BUT, IF WE, AS HUMANS,
 ARE INDEED THE HIGHEST-RANKING LIFE FORM
 ON THIS PLANET, DO WE NOT INHERIT WITH
 THAT TITLE THE RESPONSIBILITY OF PROTECTING
 THOSE 'LESS THAN US'? INDEED IS IT NOT OUR
 MORAL DUTY? THE ANSWER IS A DEFINITE
 YES! WE AS A CIVILIZED PEOPLE REFUSE
 TO CONDOLE MURDER WITHIN OUR OWN SPECIES.
 WHEN ARE WE GOING TO TAKE THE MORAL
 STEP OF EXTENDING THIS RIGHT TO THOSE
 OTHERS TRAVELING WITH US THROUGH SPACE
 ON THIS LITTLE PLANET WE CALL HOME?



Sincerely

PO BOX 221

LA 12474, NEW MEXICO

87418

LETTER 17

FOREST SERVICE RESPONSE TO LETTER 17

000017, 1985

Sew

It's been some time
since I read the EIS,
and as I recall, I
found it very
comprehensible

My wife & I
would like to see
provision made
for organizing the
wilderness for the
visiting with all the
well as backpackers

We always remember
camping in the wilderness
in 1960s when that we
were able to drive
to

Sincerely,
Lester F. Fournier

17-1 Thank for your comment regarding the EIS.

There are many degrees of wildness in the various portions of the Gila National Forest. Classified wilderness in one category. These wildernesses are areas that Congress has designated as places where "the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain" (Wilderness Act, sec. 2(c)). Motorized use within these areas are not allowed. There are, however, roads adjacent to wilderness areas that provide remote and relatively unmodified environments as another degree of wilderness. They provide a wilderness type experience with easier access.

In addition to classified wilderness, the Forest has many areas where people can recreate in a semi-primitive environment. There are roads adjacent to some of these areas and travelways within some of them. The Forest Plan provides for maintaining many areas where these semi-primitive opportunities exist.

LETTER 18

FOREST SERVICE RESPONSE TO LETTER 18



00018
EL PASO REGIONAL GROUP

Hank Pohlmann
POHLMANN & ASSOCIATES
200 PETROLEUM PLAZA BUILDING
3535 E 10TH ST
FARMINGTON NEW MEXICO 87401
(505) 325 4608
10/7/85

Dear Rio Grande Chapter Sierra Club Member,

This is a reminder in regards to the Gila National Forest Draft Plan and Environmental Impact Statement review process

If you have responded to the Plan, thank you very much for the concern, for our Southwestern environment, that you have expressed (I have received copies of many of your letters.)

If you haven't yet responded and would like to do so, may I remind you that

The DEADLINE has been EXTENDED for comment to OCTOBER 8th, 1985

The person to address your comments to is the

TO : Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061
(505) 388-8201

*I am a member of
the Sierra Club, but
I am not concerned
about any of these things
being done.*

*with National Forest
Silver City, New Mexico*

OCT 09'85

DATE RECEIVED

*you are
OK.*

Concerns that many of us have are:

- * Alternative F (the environmentally kind and economically best alternative) was not selected
- * The two Wilderness Study Areas (W.S.A.) were not recommended for wilderness recommendation
- * Roadless areas were not considered for future wilderness in terms of interim protection
- * The emphasis seems to be on expanding logging and includes the necessary road building and the harvesting of timber from steep slopes to effect this expansion
- * Non-game wildlife protection seems glossed
- * Many of the management details are vague and need clarification

Your response to these issues, or a particular issue you would like to address, would be valuable.

ALSO The Lincoln Forest comment period is coming to a close (Oct 18) and any views you have for this area should be sent to Forest Supervisor, Lincoln National Forest, Federal Bldg 11th & New York, Alamogordo, New Mexico, 88310

Thank you for your consideration.

Jim Owen

Jim Owen, Gila Forest Planning Response Co-ord, Rio Grande Sierra Club

18-1 Thank you for your comment.

LETTER 19

FOREST SERVICE RESPONSE TO LETTER 19



Oct 7, 1985

Dear Forest Supervisor

Whatever is being planned in the way
of roads, logging or other intrusions
upon the Gila Wilderness Area

DON'T

I beg you, we need some wilderness
left in this state

Sincerely,

Eve Muir

19-1

The Gila Wilderness and all other designated wildernesses on the Forest will be preserved in their natural condition. Wilderness areas are designated by Congress and managed under the Wilderness Act of 1984. All forms of motorized use are prohibited as is all timber harvest, fuelwood cutting, and road building. Grazing is allowed if the areas were grazed prior to wilderness designation.

There will be no timber harvest or road building in wilderness areas under the Forest Plan. A number of commentators have made similar comments which seem to stem from inaccurate news articles that failed to distinguish designated wilderness areas from the rest of the Gila National Forest. The similarity in names between the Gila Wilderness and the Gila Forest also contributes to the confusion. Wilderness areas are managed for non-motorized wilderness purposes while the non-wilderness portions of the Gila Forest are managed for a variety of other multiple-use objectives, including timber harvest and other recreation opportunities. Standards and guidelines for management of wilderness areas are identified in the Forest Plan. These standards and guidelines show that no timber harvest or other motorized activity will be permitted in classified wilderness.

LETTER 20

000 20

3807 Gold Street #6
Los Alamos, New Mexico 87544
October 7, 1985

Mr. Ken Scoggin, Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin:

As residents of New Mexico who have visited the Gila on numerous occasions, we would like to share our ideas about the proposed forest plan with you. In particular we are concerned with the plan's bias against wilderness recreation and feel very strongly that the two proposed wilderness study areas should be recommended for wilderness designation.

While you make the point that supply exceeds demand on all three present wilderness units in the Gila, please keep in mind that once a wilderness is invaded it is lost forever. Future generations of Americans will find open space to be an ever more precious commodity as a result of burgeoning populations. Let's look beyond the next 50 years for their sake. As Aldo Leopold himself pointed out, "Wilderness is a resource which can shrink but not grow."

In addition to the above, we strongly encourage you to include both the San Francisco and the Gila Rivers in the Wild and Scenic Rivers Program, for many of the same reasons that we support wilderness. As far as the conflict between off-road vehicular use of the areas versus nonmotorized use, I can see no justification for allowing off road vehicles into areas where they are not supposed to be in the first place being wilderness study areas. Of 3.3 plus million acres you indicate as being available for dispersed recreation, areas open to off road vehicle use exceed areas reserved for non-motorized travel by 323.6 percent. One ORV can ruin the experience of many people seeking solitude and an escape from such intrusions. Both of these rivers should be designated as wild and scenic.

The emphasis of the proposed plan on timber production is disturbing. Areas such as the Gila are of more value to the American public as recreational resources than as sources of timber. Uncalled for increases in timber production on government lands, subsidized by the taxpayers, reduces the incentive for private forest owners to harvest and cultivate their timber. The problems that accompany increases in timber production put an unfair burden on the defacto "second class" uses, watersheds, wildlife, and recreation. As more and more board feet are sought annually, sites must be logged that really should have been left alone for various reasons. We feel strongly that it is high time the Forest Service realize that the tree farm approach is no longer valid and that a more truly balanced resource use is in order.

FOREST SERVICE RESPONSE TO LETTER 20

20-1

We have reconsidered our recommendation on the two Wilderness Study Areas on the Forest and we continue to feel that they should be recommended for nonwilderness. Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

20-2

The Gila River was considered as a candidate for study as a Wild and Scenic River; however, initiation of the study was dismissed. Please refer to the Wild and Scenic Rivers section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this decision.

20-3

We disagree that off road vehicle use should not take place within Wilderness Study Areas. The law that established the wilderness study areas (PL 96-550, The New Mexico Wilderness Act) stated that "...wilderness study areas ... be managed by the Secretary of Agriculture so as to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System: Provided, that within the areas, current levels of motorized and other uses and improvements shall be permitted to continue subject to such reasonable rules and regulations as the Secretary of Agriculture shall prescribe." We have repeatedly reviewed the effects of off road vehicle use of the Lower San Francisco River wilderness study area and have not found unacceptable resource damage. Vehicle use of the area seems to have stabilized at a level considerably below the level of 1980 (the year congress designated the area a wilderness study area). We can see no need to stop this use.

Even though there is no evidence indicating that the limited ORV use in the San Francisco River Wilderness study area is causing unacceptable resource damage, we agree that there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

We also disagree with your analysis of off road vehicle opportunities. It is true that the area on the Forest that is not closed to off road vehicles is three times greater than that closed, but you fail to mention that because of the terrain on the Forest a high percentage of this is not accessible. Many of these areas can be used for non-motorized recreation and the probability of encountering a motor vehicle is very low.

The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest's resources while providing as much freedom to Forest users as possible. We have not had major problems with off road vehicle use. If ORV use becomes a problem in specific areas or if management objectives require closures, specific areas will be closed.

20-4

As a result of concerns regarding the level of timber harvest on the Forest, the projected harvest level has been reduced. The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative propose an allowable sale quantity of approximately 30MMBF. Please refer to the Proposed Action

Change Summary at the beginning of this document for additional information regarding the timber program.

LETTER 20

In closing, we ask that you reconsider the proposed forest plan and recommend PLAN F. Thank you.

Yours truly,

Colleen Woloshun

Colleen Woloshun

Keith Woloshun

Keith Woloshun

"Ability to see the cultural value of wilderness boils down, in the last analysis, to a question of intellectual humility. The shallow-minded modern who has lost his rootage in the land assumes that he has already discovered what is important; ..."

Aldo Leopold
A Sand County Almanac

FOREST SERVICE RESPONSE TO LETTER 20

20-5

Alternative F, as stated, has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F does the best at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides more complete net public benefits than Alternative F.

LETTER 21

DR GB EATMAN DC
Chiropractor
122 Girard SE
Albuquerque New Mexico 87106
Telephone 268 1331

000 21

GILA NATIONAL Forest
Silver City, New Mexico
OCT 09 '85
DATE RECEIVED

Forest Sup
Gila Nat For
2610 N Silva St.
Silver City, NM 88061

Dear Supervisor,

I am a camper and user of the Gila Forest
& would like to lend support to

- 1) Alternative F
- 2) more wilderness study area
- 3) restricted logging into the Gila Forest

in the Gila Environment Impact process,

Dr GB Eatman

FOREST SERVICE RESPONSE TO LETTER 21

21-1

Alternative F, as stated, has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is best for addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Preferred Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better over-all net public benefits than Alternative F.

21-2

We have reconsidered our non-wilderness recommendation on the two Wilderness Study Areas but we feel that the non-wilderness recommendation continues to be the correct recommendation at this time. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

21-3

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 46 MMBF in the fifth decade. The revised plan projects timber harvest at 30 MMBF per year during the first decade. The timber harvest volume is expected to remain at approximately 30 MMBF over time. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information concerning the revised timber program on the Forest.

LETTER 22

000 22

2543 35th St
Los Alamos,
New Mexico 87544
October 5, 1985

Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City
New Mexico, 88061

Dear Sir

We are writing to inform you that we would like to see logging limited and new road construction severely curtailed within the boundaries of the Gila National Forest. We consider wilderness areas to be one of our greatest resources and beseech you to work on behalf of preserving remote areas and wild life for our children.

The devastation envisioned by the proponents of the fifty-year plan would cause damage that will far outlast all of us. Would you please oppose extensive commercial use of our forest land, and in particular set aside the following areas for wilderness use:

Four San Francisco Canyon
Hells Hole
Hugollon Rim
Frisco Ro
Eagle Peak
Areas adjacent to Aldo Leopold Wilderness

In addition we oppose Connor Dam for ecological reasons

Thank you for your help in preserving our heritage,

Bob Lander & Kathryn Keith
Bob Lander & Kathryn Keith

FOREST SERVICE RESPONSE TO LETTER 22

22-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 48MMBF in the fifth decade. The revised plan projects timber harvest at 30 MMBF per year during the first decade. Timber harvest volume is expected to remain at approximately 30 MMBF over time. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information concerning the Gila National Forest timber program as proposed in the modified Proposed Plan.

22-2

Even though the Wilderness Study Areas continue to be recommended for nonwilderness, these areas along with a considerable portion of the presently unroaded area on the Forest would be managed to maintain semi-primitive recreation opportunities. This is the result of changes made to the timber program as well as comments received from the public. The modified Proposed Action Alternative proposes that a significant portion of the undeveloped areas of the Forest remain undeveloped. Please refer to the Undeveloped Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

22-3

The Bureau of Reclamation is the lead agency in the Connor dam study. As a result, we will not be making the decision on this issue. We will respond to their Environmental Impact Statement when it becomes available for public review.

FOREST SERVICE RESPONSE TO LETTER²³

23-1

Your suggested alternative is the same as that suggested by EARTH FIRST. Please see our response to Letter #2.

2. Graduate Fund
City New Mexico

OET 09 '85

DATE RECEIVED:

Dear Forest Supervisor/Forest Planner

Thank you for the opportunity to submit my comments regarding the Proposed Gila National Forest Plan. After careful consideration, I reject the Proposed Action and six alternatives for the Land and Resource Management Plan. I based my comments on hundreds of days spent in the Gila National Forest and on my experience of walking thousands of miles in the Gila National Forest.

- 1) First and foremost, the North Star Road should be closed and the Gila and Aldo Leopold Wilderness Areas combined into one unified Wilderness. Other minor dirt and gravel roads around the periphery should also be closed and the two small mud reservoirs of Snow Lake and Wall Lake removed. The 20-mile paved road into the Gila Cliff Dwellings National Monument and the developments at the Cliff Dwellings and Gila Hot Springs should be phased out over the next 10 years.
- 2) Twelve other roadless areas, totalling 1 million acres, should be protected as Wilderness Areas. Dirt roads should be closed, timber sales rehabilitated, and other developments removed to establish the following areas:
 - a) Sawyers Peak, 90,000 acres
 - b) Meadow Creek, 40,000 acres
 - c) Gila Middle Box, 72,000 acres
 - d) Hells Hole, 30,000 acres
 - e) Blue Range/San Francisco River, 165,000 acres
 - f) Nogollon Mountains, 150,000 acres
 - g) Tularosa Mountains, 275,000 acres
 - h) Frisco Box, 40,000 acres
 - i) Wahoo Peak, 60,000 acres
 - j) Escondido Mountain, 55,000 acres
 - k) Funny Rocks, 20,000 acres
 - l) Fox Mountain, 15,000 acres

The Hells Hole and Blue Range/San Francisco River areas include additional land in Arizona. Acreages are for New Mexico portions only. I have attached a map that locates these Wilderness Areas.

- 3) There should be no new road construction on the Gila National Forest, roads in the proposed Wilderness Areas should be closed and reclaimed, and all vehicles should be restricted to designated constructed roads
- 4) No old growth or previously unlogged forest should be cut There should be no deficit timber sales As a taxpaying citizen, I do not want to finance deficit timber sales Deficit timber sales means paying timber companies to cut and truck off timber Why be in the business to lose money? Road construction is not a benefit but rather a loss to the taxpayer Roads do not "open up" new areas to recreation and hunting but rather keep recreation, hunting, and wildlife away Roads severely damage water quality The money would be better spent reseeded roads -- at least that would not be done at a loss to the taxpayer!

LETTER 23

- 5) The grizzly and wolf should be reintroduced into the Gila Wilderness and possibly into the other large roadless areas of the Gila National Forest. The river otter should be reintroduced in the Gila and San Francisco Rivers, and studies should be made for possible reintroduction of jaguar, ocelot, and jaguarundi. Bighorn Sheep and pronghorn populations should be expanded.
- 6) Livestock grazing should be phased out on the entire Gila National Forest during the next decade. Negotiations should begin immediately to work out a fair, equitable program for this phase out. Areas damaged by livestock should be repaired during the next 10 years. This cost of damage is enormous, and work needs to be done immediately to restore these areas. Fair market value should be assessed for the remaining permits over the next 10 years. These values should be based upon comparable rates for private land leasing. Who will take personal responsibility for repairing the damage done to Water Canyon in the Black Range? Who will take personal responsibility for repairing the damage done to springs and water sources?
- 7) The entire Gila National Forest should be withdrawn from appropriation under the Mining Laws and Mineral Leasing Laws. Negotiations with mining companies should begin immediately to work out a fair, equitable program to withdraw this land.
- 8) All trapping and any form of predator control should be prohibited on the Gila National Forest.
- 9) There should be no use of herbicides, pesticides, fungicides, or other poisons on the Gila National Forest.
- 10) Management concentration for the Gila National Forest should be on reforestation, rehabilitation of overgrazed areas, repair of damaged watersheds, erosion control, closure of roads, protection and restoration of natural wildlife habitat, and other healing activities. Only native species should be used.
- 11) The Forest Service should work to return the entire area to a natural fire regime.
- 12) There should be no sonic booms over the Gila National Forest. There should be no low-level sonic booms over the Gila National Forest. Sonic booms, especially low-level sonic booms, are an insult to land management. Negotiations should begin immediately with the Air Force to terminate this national disgrace. I personally challenge the entire Gila National Forest staff, loyal Americans you all are, to stand underneath a low-level sonic boom and assess what damage it does to the land and wildlife.

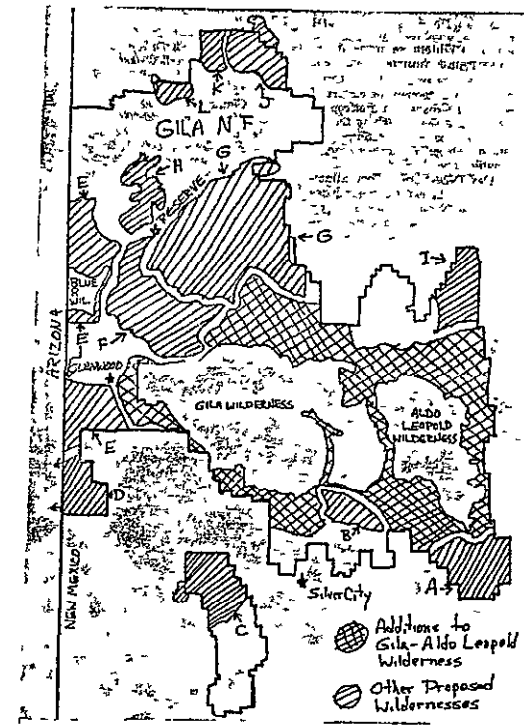
I am ready to discuss in detail with your land management staff the technical merits of my comments, especially regarding timber sales, road closure, water quality, environmental damage, and grazing. I look forward to working with your fine staff.

Sincerely yours,

Thomas Brill
Thomas Brill

P O Box 40418
Albuquerque, NM 87196

LETTER 23



LETTER 24

FOREST SERVICE RESPONSE TO LETTER 24

000 24

S. J. Ashley
P.O. Box 0698
Placitas, NM 87042

Forest Supervisor,
Gila National Forest

U.S. NATIONAL FOREST
GILA
MEXICO

DEC 11 1985

DATE RECEIVED

Dear Sir or Ms

I am writing to voice my opposition to further roads and development in general in the Gila. As a matter of fact, I am vehemently opposed to further use of the Gila by 4x4 "recreation" enthusiasts.

With one reservation, I support the Earth First! alternative for the Gila. (That reservation is the closing of the road to the Chit Dwellings). I think they need more stringent protection.

More wilderness, eliminate grazing and 4WD - restoration, rehabilitation and protection should be the order of the day.

Sincerely, S. J. Ashley

24-1

With the exception to your support for keeping the road to the Gila Cliff Dwellings National Monument open, your concerns are similar to those submitted by the EARTH FIRST organization. Please refer to our response to their letter (letter 2).

LETTER 25

FOREST SERVICE RESPONSE TO LETTER 25

000 25

OCT 6, 1985
635 Granada St
Santa Fe, NM
87501

Dear Sirs,
I am writing to urge the
National Forest Service to support
the Earth First! alternative for
the Gila National Forest. I feel that
the further development of roads
will only add to the demise of
the Gila National Forest.
Sincerely,
Randy Acorn

25-1

Please refer to our response to the EARTH FIRST proposed alternative (letter 2).

LETTER 26

FOREST SERVICE RESPONSE TO LETTER 26

BRYAN KOPP
425 Salgado Blvd.
Las Cruces, New Mexico 88005

Dear Sir:

Claim opposed
to the construction
of any roads into
the Gila Wilderness.
Please uphold the
original provisions for
the forest and let
it remain untouched.

Thank you Bryan Kopp

000 26

SINCLAIR LEWIS

1285
OCT 9 1985

SUPERVISOR

GILA NATIONAL FOREST
SILVER CITY,
N.M. 88061

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 09 '85

DATE RECEIVED

26-1

The Gila Wilderness and all other designated wildernesses on the Forest will be preserved in their natural condition. Wilderness areas are designated by Congress and managed under the Wilderness Act of 1964. All forms of motorized use are prohibited including all timber harvest, fuelwood cutting, and road building. Grazing is allowed if the areas were grazed prior to wilderness designation.

There are no timber harvest or road building in wilderness areas identified in the Forest Plan. A number of commentators have made similar comments which seem to stem from inaccurate news articles which failed to distinguish designated wilderness areas from the rest of the Gila National Forest. The similarity in names between the Gila Wilderness and the Gila Forest also contributes to the confusion. Wilderness areas are managed for non-motorized wilderness purposes while the non-wilderness portions of the Gila Forest are managed for a variety of other multiple-use objectives, including timber harvest and other recreation opportunities. Standards and guidelines for management of wilderness areas are identified in the Forest Plan. These standards and guidelines indicate that no timber harvest or other motorized activity will be permitted in classified wilderness.

LETTER 27

FOREST SERVICE RESPONSE TO LETTER 27

000 27

135 Los Nogales DR
135 Cruces, New Mexico 88001
October 7, 1985

Mr. K. C. Scoggin
Forest Supervisor
US Forest Service, Gila NF
USDA
2610 N Silver Street
Silver City, N M 88061

GILA NATIONAL FOREST
Silver City, NM

OCT 09 1985

DATE RECEIVED

Dear Mr. Scoggin,

I am responding to the Gila National Forest Planning Document that I requested from you earlier this year

I have spent some time studying the proposed plan and the enclosed summary that was provided and I am in opposition to the Proposed action referred to as 'P A ' in the above mentioned documentation. I don't feel that the proposed plan is in the best interests of all issues and concerns noted in the documentation. It is the most economical only because it harvests the current resources available

I feel that the best plan for the preservation and useage of the Gila National Forest for the people of New Mexico and the United States is through the employment of Alternative E

The second best plan is the current Alternative A

The employment of any other plan for the Gila National Forest is not in the best interest of the people but in the exploitation of the people's resources

Sincerely yours,

Marilynn J. Szydlowski

Marilynn J Szydlowski

cc Jim Norton, Wilderness Society
Jim Owen, Sierra Club

27-1

We appreciate your comment on the plan. Since you did not include your rationale for preferring Alternative E or Alternative A, it is difficult to address your specific concerns. One of your concerns, however, seems to be the level of timber harvest in the Proposed Action Alternative presented in the draft Environmental Impact Statement. This concern was expressed by many of the commentators to the Plan. As a result of these comments, the modified Proposed Action Alternative proposes to log less timber. In addition, more of the unroaded area on the Forest would be managed to maintain its semi-primitive recreation opportunities. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information related to your concerns.

LETTER 28

000 28

10/16/85
10/16/85
10/16/85

Forest Supervisor
Gila National Forest
Silver Lake, NM

The Gila National Forest Draft Plan. The Proposed Action Alternative 1 (PA1) is non-ecologically and non-environmentally sound. There is no justification for increased timber harvesting. Federal planning guidelines demand that a market demand be demonstrated and that has not (and cannot) be done.

In addition, there has been inadequate consideration given to environmental protection. The Gila River should be considered for Wild & Scenic designation and protection should be given to riparian areas unless economic justification can be shown. Private return to taxpayers for these developments.

I support Alternative F for the final plan.

Yours truly,

J. B. Graham

co-chair, Southern New Mexico
Sierra Club

Bx 986

186 Mesilla Pt., NM 85047

FOREST SERVICE RESPONSE TO LETTER 28

28-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 40 MMBF in the fifth decade. The revised plan projects timber harvest at 30 MMBF per year during the first decade. This amount is projected to remain at approximately the 30 MMBF level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54 MMBF. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads. This is a 57 percent reduction in the projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed.

28-2

The eligible portions of the San Francisco and Gila Rivers were reevaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in the Wild and Scenic Rivers Act. For a detailed discussion of the results of this analysis, please refer to the Wild and Scenic section of the Proposed Action Change Summary at the beginning of this document.

28-3

In 1980, when the New Mexico Wilderness Act was passed, the Gila had approximately 753,195 acres of undeveloped area (not including Wilderness and Primitive Area). The New Mexico Wilderness Act designated approximately 39,275 undeveloped acres wilderness and it released approximately 5,705 acres that were previously classified as primitive. Since 1980, 20,610 acres have been developed. This leaves approximately 699,015 acres of undeveloped area on the Forest (including the two wilderness study areas). Chapter 4 of the Environmental Impact Statement has been amended to show the effects of all of the alternatives on the 699,015 undeveloped area outside of classified wildernesses. In the first decade the Proposed Alternative will result in the development of approximately 20,600 acres (3 percent) of the 699,000 undeveloped acres on the Forest. We agree that the New Mexico Wilderness Act does not prohibit the management of areas to maintain their wilderness characteristics. The areas not proposed for development as part of the planning process (including the Wilderness Study Areas) will be managed to maintain their semi-primitive recreation opportunities. Over 87 percent of the undeveloped area on the Forest will still be undeveloped when the Plan is redone in 10-15 years. These areas will be reconsidered for wilderness designation when a new plan is prepared.

28-4

Alternative F, as stated, has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the best at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, (commodity and amenity) within the identified budget limits. We feel that the modified Proposed Action Alternative provides more complete net public benefits than Alternative F.

LETTER 29

FOREST SERVICE RESPONSE TO LETTER 29

000 29

Oct 6

U.S. NATIONAL FOREST
SILVER LAKE, CALIF.
OCT 09 '85
F277 10/9/85

Mr Supervisor

My name is Hal Bell, I'm a student at Hanks Highschool in El Paso. You could've probably already notice by my stationery or my spelling.

Well, down to the point, I'm concerned about the Gila National Forest Draft Plan and what it exposes to terms that I feel some concern about. I know as well as you do that this letter won't do much good because I'm just one person. Plus, if I was a congressman other than a student I would probably have a little more power concerning this issue.

I feel that the 2 wilderness study areas weren't recommended for wilderness recommendation. I'm also kind of confused or blurred on the non game wildlife protection issue. Most of the management details & ideas are vague & need either improvement or clarification. I hope I didn't trouble you much (knowing it won't matter).

Sincerely

Hal Bell

29-1

We disagree that your letter will not do much, and that if you were other than a student your comment would have more influence. Each letter received is important and each comment has been considered in the development of the final Environmental Impact Statement and Plan. We appreciate that you have taken time to respond and we have carefully considered your concerns along with all those submitted by other individuals and groups.

29-2

In response to your concerns regarding our nonwilderness recommendation for the two Wilderness Study Areas, we have re-evaluated the recommendation. After reviewing the situation, we still feel that a nonwilderness recommendation to the areas is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

29-3

We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous forest habitats are maintained at a level that compliments the forage habitat. Game species may appear to be solely emphasized, but nongame was also considered. Because of availability of data, specific game species were selected for tracking. This does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species were represented in the indicator species selected. Specific management practices for nongame species are not developed due to the large number of non-game species and the magnitude of information that would be required to track individual species. Effects of management activities on game and nongame indicator species will be monitored.

K

GILA NATIONAL FOREST
Safford City, N. M. 86402
Mr. & Mrs. George Kopp
425 Salopek Blvd
Las Cruces, New Mexico 88005

OCT 09 '85

DATE RECEIVED

OCT 8, 1985

000 10

Dear Sir,

We admire of the
magnificent Gila, which
we have enjoyed on
several visits, may we
take this opportunity
to express our opinion
to the construction of
any roads into the
Gila wilderness. We
believe it should
remain untouched,
as was established
in the original
provision for this
wilderness area.

Thank you -

Sincerely,
Patricia P. Kopp
George T. Kopp

30-1

The Gila Wilderness and all other designated wilderness areas on the Forest will be preserved in their natural condition. Wilderness areas are designated by Congress and managed under the Wilderness Act of 1964. All forms of motorized use are prohibited including all timber harvest, fuelwood cutting, and road building. Grazing is allowed if the areas were grazed prior to wilderness designation.

The Forest Plan will not allow timber harvesting or road building in wilderness areas. A number of commentators have made similar comments which seem to stem from inaccurate news articles that failed to distinguish designated wilderness areas from the rest of the Gila National Forest. The similarity in names between the Gila Wilderness and the Gila Forest also contributes to the confusion. Wilderness areas are managed for non-motorized wilderness purposes while the non-wilderness portions of the Gila Forest are managed for a variety of other multiple-use objectives, including timber harvest and other recreation opportunities. Standards and guidelines for management of wilderness areas are in the Forest Plan. These standards and guidelines indicate that no timber harvest or other motorized activity will be permitted in classified wilderness.

LETTER 31

FOREST SERVICE RESPONSE TO LETTER 31

GILA NATIONAL FOREST Silver City, N.M.	000 31
OCT 09 '85	
DATE RECEIVED	
BY 1148	
Merrill, N.M. 88046	
Oct 7, 1985	
Gila Nat Forest Supervisor	
Silver City	
88061	
Ken Scoggers	
Re building of roads in	
the wilderness area	
I would like it known I	
oppose further road building	
in Gila Wilderness area.	
Sincerely,	
Joan Kroll	
JOAN KROLL	

31-1

The Gila Wilderness and all other designated wildernesses on the Forest will be preserved in their natural condition. Wilderness areas are designated by Congress and managed under the Wilderness Act of 1964. All forms of motorized use are prohibited as is all timber harvest, fuelwood cutting, and road building. Grazing is allowed if the areas were grazed prior to wilderness designation.

There will be no timber harvest or road building in wilderness areas under the Forest Plan. A number of commentators have made similar comments which seem to stem from inaccurate news articles that failed to distinguish designated wilderness areas from the rest of the Gila National Forest. The similarity in names between the Gila Wilderness and the Gila Forest also contributes to the confusion. Wilderness areas are managed for non-motorized wilderness purposes while the non-wilderness portions of the Gila Forest are managed for a variety of other multiple-use objectives, including timber harvest and other recreation opportunities. Standards and guidelines for management of wilderness areas are identified in the Forest Plan. These standards and guidelines show that no timber harvest or other motorized activity will be permitted in classified wilderness.

LETTER 32

FOREST SERVICE RESPONSE TO LETTER 32

000 32

October 7, 1985

Mr. Kenneth Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City, NM 88061

Dear Mr. Scoggin,

The Shelley family has held a forest grazing allotment on the Gila National Forest since the turn of the century. We are quite concerned that a Draft Environmental Impact Statement that dramatically affects our livelihood without any consultation whatsoever with us or any of our neighboring permittees, could be developed.

The 123-head allotment we currently hold is to be decreased by 60% leaving us with a 49-head permit on forest lands. In order to make a living it is necessary to supplement our income with outside employment and should this reduction become a reality it will make it impossible for us to remain in the cattle business. We feel sure the Forest Service understands the effects that such a reduction will have upon us and other permittees. This leads to the question of why the Forest Service wants the cattle removed from the forest lands? The assumption that these permit lands would support more wildlife with decreased cattle numbers is incorrect and absurd. We would have you examine the Wilderness lands adjoining us as proof of our point.

If the Forest lands are to be managed for maximum benefits of multiple use and all concerned it is imperative that cattle and cattle people be involved in any program development.

Sincerely,

Jim Shelley

Jim Shelley
Permittee

JWS 11

32-1

The proposed Gila National Forest Plan and the draft Environmental Impact Statement have been in development for some time. Progress reports have been discussed with the Gila Advisory Board on an annual basis. The draft Environmental Impact Statement provides all interested parties with the opportunity for consultation. Public meetings and workshops have also been provided to inform and gain public input into the process.

32-2

The projections listed in the proposed Forest Plan are only projections. The percent adjustment you mention is an overall projection for the management area. The actual adjustment in stocking numbers will be determined through the R3 range environmental analysis process on an individual allotment bases. An evaluation of impacts, permittee consultation, and user cooperation will be necessary to determine the proper stocking rate and the management emphasis for each management area. The intent is not to remove cattle from the Forest, but to identify existing and potential conflicts between competing uses of the resource and to provide for the proper level of management. The degree of overlap between wildlife species and livestock will vary by individual area. The actual ability of the land to support more wildlife or livestock will be determined as per the procedure described above. Should the limiting factor for proposed increased wildlife numbers not be related to livestock activities, continued livestock use will result as per the new standard and guideline added to each management area.

32-3

We agree, as demands increase for all uses it is imperative that all resource users become involved in program development.

LETTER 33

FOREST SERVICE RESPONSE TO LETTER 33

Mesilla Valley Grotto
Southwestern Region
National Speleological Society
P.O. Box 2763
Las Cruces, N.M. 88004-2763
October 8, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver St.
Silver City, N.M. 88061

000 33

Dear Sir:

On behalf of the Mesilla Valley Grotto and the Southwestern Region of the National Speleological Society, I am responding to the draft Environmental Impact Statement of the Gila National Forest Management Plan.

Overall, the plan looks very good. The only deep concern I can see is the proposal relating to oil, gas, and mineral exploration north of the wilderness areas. I hope that leasing of exploration rights be done on a very gradual, limited basis and monitored very closely by the Gila National Forest. In the event of abuse of the environment, I hope the Forest Service will halt the exploration and cancel the exploratory rights of the abusing party.

No specific mention of cave resources seemed to be mentioned in the draft. Though we only know of cave resources in the Black Range District of the Gila, we hope the plan of the Gila National Forest will be flexible enough to allow for future management plan possibilities of any caves now known or yet to be discovered.

Again, the overall plan looks very favorable and conservative in my opinion. Thank you for giving us the opportunity to review and respond to the draft.

Sincerely,

Jeffrey H. Lory

Jeffrey H. Lory
Secretary-Treasurer
Southwestern Region-N.S.S.

33-1

Nearly all of the north end of the Forest outside wilderness has already be leased for oil and gas exploration. Before leases were recommended the effects on the Forest were carefully considered and detailed stipulations included (in each lease) to protect National Forest values. In the unlikely event exploration rights are exercised on a lease, more environmental analysis would be done (approximately 95 percent are never explored). The lessee would be required to submit an exploration plan which would be evaluated for environmental effects and compliance with the lease stipulations. Generally, oil and gas leases have been very cooperative and abuses are rare.

33-2

There are a few known caves on the Forest and probably others yet to be discovered. However, the number and recreational use of the cave resource is so limited that caving considerations were not included in the Environmental Impact Statement. There is nothing in the Plan that precludes management of the cave resource should more intensive management become necessary. If cave management becomes necessary in order to protect cave resources, standards and guidelines can be added by amending the Plan.

LETTER 34

FOREST SERVICE RESPONSE TO LETTER 34

34-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount was projected to increase over time to 48MMBF in the fifth decade. The revised plan projects timber harvest at 30 MMBF per year during the first decade. This amount is projected to remain at approximately the 30 MMBF level over time. Please refer to the Proposed Action Change Summary at the beginning of this document for details concerning the revised timber program proposed in Final Plan and EIS.

34-2

In your concern you mention several factors that you feel will be affected as a result of timber activities. These include erosion, damage to wildlife habitat, degradation of the region's water supply, and elimination of remaining unroaded areas. We feel that we need to address each of these separately.

It is true that timber activities will result in additional soil loss. This soil loss, however, will be minimized through the use of Best Management Practices [practices designed to minimize the effects of nonpoint pollution, in this case sediment, sources]. This will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long term productivity.

The modified Proposed Action Alternative actually results in an improvement of wildlife outputs over time. Many of the game species are benefited by the type of management practices conducted within timber sale areas. Through integrated stand management, diversity of age classes will be increased resulting in a benefit to many types of wildlife. If the management direction started in the first decade were continued for 50 years, the modified Proposed Action Alternative would only result in a long term 12 percent reduction in old growth habitat. This should provide substantial amounts of habitat for wildlife that requires high serial stage timber areas.

Since sediment from timber areas will be controlled and the overall soil loss from the Forest will be reduced over time, water quality should generally not decrease. Water yield will continue to decrease somewhat (not significantly) because timber is growing faster than it is being harvested. As the square feet of growing stock (trees) increases, the water yield decreases. Without timber harvest activities or some other activity that would reduce the growing stock, water yield would continue to go down. Thus, timber harvest will actually increase the region's water supply rather than degrade that supply.

Because of changes in the amount and location of timber harvest activities and changes made as a result of public concerns, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the unroaded areas of the Forest remain undeveloped and available for semi-primitive type recreation. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the unroaded areas on the Forest.

Roger Steeb
316 E Picacho
Las Cruces, NM 88001

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, NM 88061

GILA NATIONAL FOREST
Silver City, NM

000 34

OCT 09 '85

ATTN: Forest

Dear Sir

I am writing in regard to the draft Management Plan for the Gila National Forest. The "preferred alternative" calls for increased timber harvests and greatly expanded program of road building. The result will be erosion, damage to wildlife habitat, degradation of the region's water supply, and elimination of the remaining roadless areas.

These impacts, apparently, will not be
balanced by economic gains from the proposed actions. In recent years,
logging and road building in the Gila has cost the taxpayers more than the
revenue returned

3

34-3

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived,

at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for recreation and fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of timber sales. Sale of timber in some areas, for example, is designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of some of the benefits that need to be taken into consideration in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are taken into consideration, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

34-4

We agree that riparian habitats are extremely important. To clarify our management objectives modified our standards and guidelines. Please refer to the Riparian section of the Proposed Action Changes Summary at the beginning of this document.

34-5

Presently there is very little ORV use in the Hells Hole area. Most of this area is not accessible by ORVs. The San Francisco River is being used, but this use has actually declined since 1980. We can find no evidence that this use is causing significant damage in either area.

Since you have a concern related to ORV use in the San Francisco River, we felt that we should also explain our rationale for lifting the seasonal closure on that area and for our proposed management in the area.

The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the canyon but to all unauthorized entry, including recreational hiking. Since the closure was enacted, a study of the canyon prepared by the Museum of Northern Arizona [Riparian Ecology of the San Francisco River; Carothers, Steven W. et.al., 1982] indicated that at that time the Black Hawk was not nesting in the Main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the River is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the ORV use of the canyon may cause erosion of the river benches. This conclusion was made by

the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly effected the natural erosion rates.

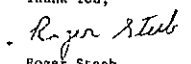
Based on the available data, we do not find any resource protection reason to continue the seasonal closure. The ORV use in the canyon actually peaked at a use level of 1184 recreation visitor days in 1980. Since that time the trend seems to be down. The 1983 data [latest compiled data] indicated a motorized use level of 438 recreation visitor days. Much of this use occurs in a small portion of the canyon.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

The plan also fails to address protection for the small
amount of riparian woodland in the Southwest that remains in a natural state
The Lower San Francisco Canyon and Hells Hole need to be protected from off
road vehicle damage

4
5

Thank You,


Roger Steeb

LETTER 35

FOREST SERVICE RESPONSE TO LETTER 35

5/21/88

11 09 1988

DATE RECEIVED

10/25/88

1075A PALOMAS RASE

Albany N. Mex

87108

Kenneth Saggan - Forest Supr
Gila National Forest
2610 N. Silver ST
Silver City, N Mex 88061

000 35

Re: Draft Gila NF Mgt Plan/EIS

Dear Mr. Saggan,

I have reviewed the subject documents and provide the following comments for the public record.

General

I am generally agree with and support the PA alternative, with exceptions as noted below:

Issue 3 - Range Resources

Propose Alt A - Additional grazing impacts are not warranted until management at current levels is improved. Some portions of current allotments are severely loaded with the 'easy' country - often riparian zones, canyon bottoms and existing meadows are beaten into dust. Heavily impacted areas are often those preferred by wildlife and recreational users, hence competition for both commodity and non-commodity resources is intensified. I cannot support increased grazing until the inequities of grazing impact at current levels and current management are resolved.

35-1

We feel that you must have misunderstood the level of domestic use in the Proposed Action Alternative. The Proposed Action Alternative does not project an increase in domestic livestock use. It actually projects a 10 percent reduction in the permitted livestock on the Forest. This decrease in permitted numbers along with a 10 percent projected increase in capacity, resulting from improved management, will result in permitted numbers and capacity being equal by sometime in the second decade. This should help resolve the problems that you mention.

In the Final Plan, we have also clarified our intent relating to the management of riparian areas. Please refer to the Riparian section of the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the changes made to the standards and guidelines affecting riparian areas.

Issue 4 - Recreational options

Under the present FS ORV management philosophy, the Forest is considered "Open to ORV use unless designated 'Closed' or 'Designated Travelway'". This is exactly 180° from what it should be (i.e. "Closed" unless designated "Open"). The result of this "hands off" attitude/practice by the FS is the fostering of a tradition of use, and, often abuse.

Alternative 1A is simply a perpetuation of the approach of the past at far grosser levels. It simply does not provide for enough closures, road closures etc. Selection of an alternative which allows the largest roaded area is not only contradictory to the growing need to control motorized use, it is pandering to those interests. I am strongly opposed to Alt 1A on this issue.

Issue 5 - Fish & Wildlife Habitat

The 1A alternative would be acceptable but, except for the increased grazing and insufficient protection afforded canyon bottoms, riparian zones and meadows. A similar criticism also applies re: Recreational options. Both are counter-productive to fish and wildlife (& negative impacts) at the local environment. I support alt "E" on this issue.

35-2

We disagree that the Forest should be closed to ORV use except in specific areas designated as open. The management philosophy on the Forest has, and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require additional closures, specific areas will be closed or restricted to ORV use.

35-3

See response to comment 1.

Issue 6 - Transportation Facilities

The mix of options and levels of maintenance proposed under the various alternatives is difficult to ascertain. I am however very much opposed to any reconstruction of the upper reaches of Forest Rd 47 (E of #94) and of the stretch of 94 between Dutchman Spring and Canyon Knob. Both lie in riparian zones, both are relatively narrow, both would result in large cuts & fills, and both would result in more prostitution of the wildlife resource to road hunting. It is not the obligation ~~to~~ of the Forest Service or the Yuba Forest to "make the world safe" for Coonhounds and Wambagors!

The same comment applies to the proposed construction / reconstruction Hwy 78 and Cooney / Boughton Corridor. Excellent alternate access already exists between these two points and only 3 to 7 miles north. There is simply no need for this road except to shorten travel time from point to point by an hour. All the access necessary already exists. I am strongly opposed to these so called 'improvements'. Full & service (status quo) is sufficient. I therefore support act A on this issue.

35-4

We assume from your description, the two roads to which you refer are the portions of Road 47 shown in green on the transportation system map and the connection of Road 141 to State Highway 59 (also shown in green on the map).

Most of the portion of road 47 that you reference has already been reconstructed. It was done in conjunction with timber sale activity in the area. Approximately one mile of this road is yet to be reconstructed. We feel this road is needed for resource activities in this area and plan to do the reconstruction during the 10 year planning period. The Transportation Map has been modified to show only the one mile that is yet to be reconstructed.

The road that you refer to as being approximately three to seven miles north of the proposed extension of Forest Road 141 (State Highway 78) has recently been eliminated from the State Highway System. As a result it will no longer be maintained by the State. There is no right-of-way on the portion of this road off of the National Forest. Without such a right-of-way, it appears that access to that portion of the Forest served by what was highway 78 could be denied by landowners. Tentative analysis of the situation indicates that it may be more cost effective to construct the connecting link from Forest Road 141 to State Highway 59 than it would be to acquire right-of-way for old State Highway 78. We will continue to evaluate this situation in an effort to provide Forest access in the most cost effective manner.

LETTER 35

Issue 7 - Wilderness Study Areas

It was opposed to alternatives which do not provide for wilderness designation of the two WSA's mentioned. Resource damage and user conflicts have long characterized the lower San Francisco. Vehicle use (and abuse) is strange, negative to other riparian interests, particularly wildlife. It appears that wilderness designation is the only way to give protection for these areas. I support Alternative F on this issue.

Issue 8 - Riparian Habitat

I support Alternative F on this issue, for reasons previously stated. Riparian zones are either avoided or preferred habitat for many wildlife species. They are preferred habitats. Fish and wildlife concentrate there because of the shade, forage, and water. Competition for resources (and animals) is intensified. To date there has been little effort to

manage these areas and to resolve conflicts. Given the years of relative neglect by the FS, extra attention is warranted. If this means exclusion of some users (particularly cattle) then so be it. They have had free run of these areas for a hundred years. It's time for a change. I support Alternative F for reasons noted throughout this letter.

35-2

We have reevaluated our recommendation on the Wilderness Study Areas, but continue to support the nonwilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for more details concerning the rationale for this recommendation.

Your comment referred specifically to the ORV use of the San Francisco River; thus, we have included our rationale for dropping the seasonal closure of the River and for our proposed management.

The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the canyon but to all unauthorized entry, including recreational hiking. Since the closure was enacted, a study of the canyon done by the Museum of Northern Arizona [Riparian Ecology of the San Francisco River; Carothers, Steven W. et al., 1982] indicated that at that time the Black Hawk was not nesting in the main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the river is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the ORV use of the canyon may cause erosion of the river benches. This conclusion was made by the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly affected the natural erosion rates. Based on the available data and the fact that ORV use has decreased since the studies were conducted, we do not feel there is a resource damage reason to continue the seasonal closure.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

35-6

We agree that riparian habitats are extremely important. The standards and guidelines mentioned in response to your comment number one have been added to clarify our management of this resource. The reduced level of timber harvest in the modified Plan should also result in a reduction in impacts on riparian habitats. These changes in the Plan are expected to result in an increase in riparian habitat condition over time, but the increase will still not be attained as fast as it would be if Alternative F were implemented. Due to the multiple use goals in the Proposed Action alternative and the associated budget constraints, it is not possible to attain those accelerated levels of riparian management. Riparian condition is a major concern on the Forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken. The riparian section in Chapter 4 of the EIS contains a more complete description of the effects of all of the alternatives on riparian habitats.

AFFECTED ENVIRONMENT

Recreation - Demand for motorized recreation should be recognized as distinct from need. The tendency of the FS is to assume that new demands (as by ORV users) are perfectly valid, acceptable, appropriate and worthy of recognition through more and more sacrifice areas designated to those interests. I submit that resource damage should be the criterion by which those allocations are made, not simply because some user group wants more land or fewer restrictions.

Environmental Consequences

USA's Designation of the two USA's ~~as~~ as wilderness is not an irrevocable commitment of the resource since designation can be withdrawn by Congress.

p. 100 NAT Comprehensive Plan for Wildlife

This Plan is currently in revision. What provisions are made by the FS/GNF/Nat Plan/GCIS to respond to any new directions or recommendations of the new or updated Comp Plan? Given the acknowledged importance of the G.N.F. for recreation.

I would think that the Proposed Action alternative would be more responsive than to show "moderate" attainment of Plan Objectives.

35-7

Resource damage has always been a consideration in our decisions on ORV use of the Forest. ORV use of the Gila has been light and has caused little resource damage. Most use is in support of other activities such as camping, fuelwood harvest, etc. The level of resource damage associated with ORV use was taken into consideration in making the decision to leave the Forest open except for designated wilderness and areas specifically closed. Resource damage will continue to be one of the main decision criteria used in determining if specific areas should be closed. If significant resource damage is occurring or it is likely to occur, individual areas will be closed. The Forestwide standards and guidelines on ORV use have been modified to clarify this point.

35-8

We agree that wilderness designation is not an irretrievable commitment of resources. We did not state that it is in the Environmental Impact Statement. Irretrievable commitment of resources is defined on page 89 of the draft Environmental Impact Statement as opportunities foregone for the period during which resource use or production cannot be realized. With this definition, irretrievable resource commitments would be any outputs that could not be obtained during the time an area is designated wilderness.

35-9

Between the draft Plan and the final, we met with the New Mexico Game and Fish Department to coordinate their draft State Comprehensive Plan with the Forest Plan. In comparing their goals with our Proposed Action Alternative, we discovered we could not totally meet the Game and Fish goals but we could meet a significant portion of their draft goals for big game species. WMGF's goals are in draft form and may change, but based on the best information we have it appears we can meet 100 percent of their goals for turkey, bighorn sheep, and prong horn; 75 percent of their goal for deer; and 90 percent of their goal for elk. These are the species that resulted in most of the hunting recreation associated with game animals.

At the time of the coordination meeting, the Game and Fish no draft goals for fish and nongame species were available, but the increases in the Plan should provide for meeting at least a portion of their goal. Since the Game and Fish Department is a single interest agency (wildlife and fish), it is doubtful that our multiple use objectives will result in meeting 100 percent of their goals.

No discussion of "Environmental Consequences" should fail to mention mitigation measures or how they will be assured and implemented:

IMPACT - MITIGATION = ENVIRONMENTAL CONSEQ

Consistent with CFR 1500-1508 mitigation measures are to be assured or guaranteed not simply mentioned or promised. The Draft EIS fails to do either. This deficiency can be corrected by: incorporating a general list of mitigation measures (b) stating that all management decisions and actions will include the mitigation measures appropriate to the nature and magnitude of that decision or action (c) making specific mitigation measures a part of assessing EA's, contrasts etc etc through incorporation in those documents.

Finally, it should be noted that FONSI's whether based on an EA or an EIS are always (a) contingent on certain assumptions regarding mitigation. Unless steps are taken to assure that mitigation measures - as promised and on which decisions are based - actually come to pass, then the responsible federal official is in a posture of substantial non compliance with Section 101 of NEPA. On this basis he is also vulnerable to legal action.

Please make these comments part of the official record.

Larry T. Candell

35-10

We agree that impacts minus mitigation equals environmental consequences, and that mitigation measures need to be assured. That is why they are included in the standards and guidelines.

The Forest Plan and EIS are programmatic documents and contain a level of detail consistent with program level direction. No attempt was made to do project design or project level analysis during forest planning. The standards and guidelines in the Plan specify, at the appropriate level, what management practices will be undertaken on the Forest and what practices will be taken to mitigate management activities. For example, there is a forestwide prescription that states that "Through the use of best management practices, the adverse effects of planned activities will be mitigated and site productivity maintained. Soil loss due to management will not exceed soil loss tolerances". This is just an example of the many mitigation

standards and guidelines included in the prescriptions. Similar mitigation activities are implicit in the prescriptions selected for the various alternatives. More specific mitigation measures will be included in Environmental Assessment documents for individual implementation projects that require this type of documentation.

Prescriptions, including the standards and guidelines are the management direction for the Plan. If this management direction is significantly changed, the Plan has to be amended or revised. We agree that if the responsible official does not comply with the management in the Plan he/she will not be in compliance with section 101 of NEPA and that legal action could be taken. We feel that this is pretty good assurance that actions will be in compliance with the mitigation measures in the standards and guidelines. Many of the monitoring activities will also assure compliance with the management direction (including mitigation activities) in the Plan.

LETTER 36

FOREST SERVICE RESPONSE TO LETTER 36

000 36

1005 Gold St.
Silver City, N.M.
Oct. 8, 1985

Ken Sengguis
Area Forest Supervisor
2610 Silver St
Silver City, N.M. 88061

Dear Mr. Sengguis:

Please don't shortchange the wilderness areas
in the Kila National Forest, don't increase commercial
timber harvests, and could you really consider
designating the Lower San Francisco Canyon for
wilderness designation?

Of the alternatives put forth, Alternative
F comes closest to my idea of proper FOREST manage-
ment. I wish alternative F were your preferred choice.

Regards,
Art Howard

36-1

As a result of public comment, the Plan has been revised to reduce the sawlog harvest from 35MMBF to 30 MMBF per year. This harvest level is approximately equal to the average harvest for the past 10 to 15 years.

36-2

We have reevaluated our nonwilderness recommendation for the two Wilderness Study Areas and feel that the recommendation is valid. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

36-3

Alternative F, as stated, has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most effective at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits.

000 37

Dear Forest Supervisor,

We are opposed to all
alternatives except alternative F
and would like a public hearing
on the alternatives regarding
the forest use plan

Sincerely,

James A. O'Brien 344 N. Bayard St.
Joseph Henderson - Member
Dore Elumy - Member
Ed M. Gifford 430 E. Market St., SC
Dorothy Kyle
Tim Cunningham 300 N. Arizona
Lorraine Salazar S.C.
Scott Hall 251 1/2 W. 1st St., Silver City

37-1

Alternative F, as stated, has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most effective at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits.

37-2

You also requested a public hearing on the Plan. In order for us to have responded to this request it would have had to been received earlier in the public involvement process. We do not feel that a hearing at the time this comment was received would have significantly added to the accomplishment of our public involvement goals. These goals were:

1. To broaden the information base upon which land and resource management planning decisions are made;
2. To ensure that the Forest Service understands the needs, concerns and values of the public;
3. To inform the public of Forest Service land and resource planning activities; and
4. To provide the public with an understanding of Forest Service programs and proposed actions.

We feel that even though hearings were not held, the goals were met.

Our public involvement process began in 1980 when issues and concerns were developed. At this time public meetings were held and public input was solicited through announcements in 14 newspapers and 18 radio and television stations. As a result, 369 responses to issues and concerns were received. It also resulted in a 2,374 name mailing list.

Before the draft Environmental Impact Statement was distributed in May, 1985, all individuals on this mailing list were asked which planning documents they would like to receive. Those that responded were sent the appropriate documents. In addition, availability of the documents was announced in newspapers and over radio. On May 31, 1985, the Environmental Protection Agency printed the notice of availability of the Plan and Draft Environmental Impact Statement in the Federal Register.

Letters mailed with the planning documents and news releases contained an invitation to members of the public or public groups to meet and discuss anything they did not understand, as well as to express concerns. This invitation was well received and resulted in 10 meetings with groups that had concerns about the Plan. We also met individually with several individuals that had questions.

We feel that this process was appropriate for our publics and met our public involvement objectives. We received over 270 responses on the Plan and Environmental Impact Statement as a result of the process. We do not feel that hearings would have added greatly to the public involvement effort.

000 38

10 8 85

TO THE FOREST SUPERVISOR,

IN RESPONSE TO YOUR DRAFT ENVIRONMENTAL
IMPACT STATEMENT, PLEASE CONSIDER THE
FOLLOWING COMMENTS

- STEEP SLOPE LOGGING INCREASES
RUN-OFF, CAUSES EROSION AND SILTATION,
AND SHOULD BE MINIMIZED
- PRODUCTION CAPABILITY SHOULD BE
IMPROVED ON GRAZING RANGES BUT
DOMESTIC LIVESTOCK CAPACITY SHOULD
NOT BE INCREASED, AGAIN TO LIMIT
EROSION AND TO PROTECT WILDLIFE
UPPER WATERSHEDS AND RIPARIAN
HABITATS NEED BETTER PROTECTION
FROM DOMESTIC LIVESTOCK
- EXISTING ROADS AND TRAILS ARE
IN POOR CONDITION BOTH NEED
IMPROVEMENT ESPECIALLY TRAILS,
REQUIRING LESSER LAND IMPACT AND
CLEANER RECREATION (I.E. HIKING,
HORSEBACK RIDING, TRAIL BICYCLING,
TENNIS, ETC.)

- FISH AND WILDLIFE HABITATS SHOULD
BE IMPROVED AND MAINTAINED WITH
SPECIAL REGARDS TO THE MANY LOCAL
ENDANGERED AND THREATENED SPECIES
- HELL'S HOLE AND THE LOWER SAN
FRANCISCO DESERVE WILDERNESS CLASSIFI-
CATION
- ECONOMICALLY, ALTERNATIVE F HAS THE
LOWEST ANNUAL COST, BUT THE HIGHEST
TOTAL BENEFITS

38-1

Logging of steep slopes using cable logging methods will result in less soil being disturbed than the soil disturbance created by the conventional method of tractor logging. Although soil loss will occur, it will not be significant enough to affect the long-term productivity of the site. Soil losses from devastating wildfires is far greater because fire consumes the duff, debris, and litter and leaves nothing to stop the off-site movement of the soil. All sale contracts require the timber operator to install erosion control devices on roads, skid trails, and landings to prevent soil loss. Disturbed areas are reseeded to afford additional protection. In the modified Proposed Action Alternative cable volume has been reduced to 59 percent of the volume proposed in the original Proposed Action Alternative.

38-2

The Proposed Action Alternative will cause existing capacity to rise from 314,222 AUM'S to 350,000 AUM'S. Much of this increase is the result of recent changes in management direction and investment in range improvement. This will require that permitted capacity be reduced from 383,744 AUM'S to 350,000 AUM'S by the end of the first decade. In addition, the Plan calls for stabilizing riparian habitats and improving wildlife habitats during the same period. Our management of riparian habitats have been clarified in the final Plan by adding several standards and guidelines to the Forestwide management direction portion of the Plan.

38-3

The proposed Gila National Forest Plan recognizes the need to increase the road and trail maintenance. Both of these activities have been increased in the modified Proposed Action Alternative. The proposed trail maintenance budget is approximately 288 percent higher than the 1984 trail maintenance budget. This will probably not completely stop the reduction in trail miles over time since some of the trails on the Forest were constructed for activities that can be accomplished on roads, but it should provide for a significantly higher level of maintenance to trails defined to be part of the permanent trail system.

38-4

We agree. The proposed Gila National Forest Plan calls for considering the needs of threatened, endangered, or sensitive plants and animals in implementing all resource activities.

38-5

We have reevaluated our recommendation on the two Wilderness Study Areas, but we still feel that a nonwilderness recommendation is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

38-6

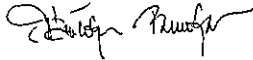
Alternative F has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs (both commodity and amenity) within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

THE GILA FOREST IS A VERY PRECIOUS
ECOLOGICAL SYSTEM HELPING THE DESERT
GET ITS SUPPLY OF WATER.
ONE OF THE LARGEST NATIONAL FOREST
IN THE USA, IT IS BOUND TO BECOME
A MAJOR RECREATION SITE AS MORE
AND MORE FORESTS DISAPPEAR FROM
THE EARTH.

IMPROVING AND STABILIZING THE
FLORA AND FAUNA OF THE FOREST
SHOULD BE OUR HIGHEST PRIORITY.
EMPHASIS SHOULD BE PUT ON CUR-
RENTLY AVAILABLE RESOURCES THEREFORE,

I SUPPORT ALTERNATIVE "F" ABOVE
ALL OTHERS OF THE EIS FOR
THE GILA NATIONAL FOREST.

RESPECTFULLY



FRANÇOISE BENOIST
RT 15 BOX 1650
SAN LORANZO, NM, 88057

000 39

Forest Service Supervisor,

I am opposed to all
Alternatives in the fifty
year plan except:
Alternative F...

I would like a
public hearing on
the Forest 50 year
plans

Jody Pugh
Box 1384
Silver City, NM
88062

39-1

It needs to be noted that the Plan is not a 50 year plan. Even though the Environmental Impact Statement analyzed the effects of the Plan for 50 years, the Plan direction is only for 10 to 15 years. The Plan will be redone sometime during this 10 to 15 year period.

We do not agree that Alternative F is the best alternative for the management of the Forest. Alternative F has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

39-2

You also requested a public hearing on the Plan. In order for us to have responded to this request it would have had to been received earlier in the public involvement process. We do not feel that a hearing at the time this comment was received would have significantly added to the accomplishment of our public involvement goals. These goals were:

1. To broaden the information base upon which land and resource management planning decisions are made;
2. To ensure that the Forest Service understands the needs, concerns and values of the public;
3. To inform the public of Forest Service land and resource planning activities; and
4. To provide the public with an understanding of Forest Service programs and proposed actions.

We feel that even though hearings were not held, the goals were met.

Our public involvement process began in 1980 when issues and concerns were developed. At this time public meetings were held and public input was solicited through announcements in 14 newspapers and 18 radio and television stations. As a result, 369 responses to issues and concerns were received. It also resulted in a 2,374 name mailing list.

Before the draft Environmental Impact Statement was distributed in May, 1985, all individuals on this mailing list were asked which planning documents they would like to receive. Those that responded were sent the appropriate documents. In addition, availability of the documents was announced in newspapers and over radio. On May 31, 1985, the Environmental Protection Agency printed the notice of availability of the Plan and Draft Environmental Impact Statement in the Federal Register.

Letters mailed with the planning documents and news releases contained an invitation to members of the public or public groups to meet and discuss anything they did not understand, as well as to express concerns. This invitation was well received and resulted in 10 meetings with groups that had concerns about the Plan. We also met individually with several individuals that had questions.

We feel that this process was appropriate for our publics and met our public involvement objectives. We received over 270 responses on the Plan and Environmental Impact Statement as a result of the process. We do not feel that hearings would have added greatly to the public involvement effort.

LETTER 40

000 40

October 7, 1985

Dear Mr. Scoggins

I feel that some important issues have been inadequately covered in the Environmental Impact Statement for the Final National Forest Proposed Plan. Surely such an important decision as which of the Proposed Action Alternatives to choose, deserves the input of a public hearing. The unnecessarily obscure format and wording of the "Summary of the Draft" requires some straight-forward explanations of what exactly is being proposed, in terms of specific projects to be authorized under the various alternatives. Just there are those 1,500 miles of new roads going to be? What plans for watershed protection are to be implemented, considering expanded timber harvest activities? What does the Forest

1
2
3

FOREST SERVICE RESPONSE TO LETTER 40

40-1

In order for us to have responded to this request it would have had to been received earlier in the public involvement process. We do not not feel that a hearing at the time this comment was received would have significantly added to the accomplishment of our public involvement goals. These goals were:

1. To broaden the information base upon which land and resource management planning decisions are made;
2. To ensure that the Forest Service understands the needs, concerns, and values of the public;
3. To inform the public of Forest Service land and resource planning activities; and
4. To provide the public with an understanding of Forest Service programs and proposed actions.

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Letters mailed with the planning documents and news releases contained an invitation for members of the public or public groups to meet and discuss the Plan or to express concerns. By providing this opportunity, arrangements could be made to discuss the Plan at a time convenient to anyone and not just at some predetermined hearing times. This opportunity was open to everyone. This invitation was well received and resulted in 10 meetings with groups that had concerns about the Plan. We also met individually with several people that had questions.

We feel that this process was appropriate for our publics and met our public involvement objectives. We received over 270 responses to the Plan and Environmental Impact Statement as a result of the process. We do not feel that hearings would have added greatly to the public involvement effort.

40-2

The 1500 miles of roads to which you refer would have been constructed primarily to access suitable timber areas. The management areas to which mileage was added are indicated in the draft Plan. Between the draft and final Plan, the projected timber allowable sale quantity has been reduced. This has resulted in a 57 percent projected reduction in the road construction mileage.

40-3

As stated above, timber allowable sale quantity has been modified in the final Plan. The planned level is now 30MMBF. This is equal to the average harvest from the Forest for the last 10 to 15 years. Watersheds protection is a part of our current timber harvest activities and will continue to be a part of our planned timber harvest activities. The Forest hydrologist reviews all timber sales on the Forest and provides for mitigation measures. Timber sale contracts contain clauses to provide for watershed protection. In addition, the Forest Plan states that Best Management Practices will be used to control nonpoint pollution that could be caused by soil loss.

LETTER 40

Service stand regarding Threatened Species status for the
spikedace and loach minnow? These and numerous other ques-
tions deserve the consideration of a public hearing

As for myself, family and quite a few friends, we support
Alternative F.

Thank you.

Joe Ward

Joe Ward

P O Box 1272

Silver City, New Mexico 88062

FOREST SERVICE RESPONSE TO LETTER 40

40-4

The U.S. Fish and Wildlife Service is the agency involved in the designation of Threatened and Endangered Species. When the species exist on the Forest, the Forest wildlife biologist provides input to the appropriate Fish and Wildlife agencies. Similar to the opportunity provided the general public, we have provided our input. The U.S. Fish and Wildlife Service has declared these species as threatened and endangered.

40-5

We appreciate your comment regarding Alternative F, but we do not feel that it is the best alternative for the management of the Forest. Alternative F has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides a better level of overall net public benefits than Alternative F.

41-1

We need to point out that the Plan is not a 50 year plan. Even though the Environmental Impact Statement analyzed the effects of the Plan for 50 years, the Plan direction is only for 10 to 15 years. The Plan will be re-done sometime during this 10 to 15 year period.

41-2

We do not agree that Alternative F is the best alternative for the management of the Forest. Alternative F has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

41-3

You also requested a public hearing on the Plan. In order for us to have responded to this request it would have had to been received earlier in the public involvement process. We do not not feel that a hearing at the time this comment was received would have significantly added to the accomplishment of our public involvement goals. These goals were:

1. To broaden the information base upon which land and resource management planning decisions are made;
2. To ensure that the Forest Service understands the needs, concerns, and values of the public;
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We feel that this process was appropriate for our publics and met our public involvement objectives. We received over 270 responses to the Plan and Environmental Impact Statement as a result of the process. We do not feel that hearings would have added greatly to the public involvement effort.

000 41

10/7/85

Dear Forest Service,

I understand you all are in the
making up a long list of things to
deal with on the way to the future
improved I feel that although the
are closest to how I feel I would
compare to what you would
also say such like the public
through the way of the
It is public in the
about the way of the

Yours truly,

P.O. Box 1
Amenity

LETTER 42

Daniel J. Minner
 San Lorenzo
 R'ou-Muphas

Kenneth Scaggins
Forest Supervisor
Gila National Forest
Silver City, New Mexico

000 42

Castings,

I would like to comment on your proposed 50 year plan for the Gila National Forest. To begin with, of all your stated alternatives I favor A-E for several reasons. First, according to your chart on the summary statement it would be cheaper to implement and would have the highest net of benefits. Next the amount of acres in logging and road building proposed in your proposed Action alternative would in my opinion, (based on what we saw in this part and other in mountainous areas) mean no off industry and we have not put them as contributors to the flooding and retention problems of the Gila and San Francisco mountains.

Also, I think that Hell's Hole, ~~and~~ ^{near Santa Ana River} ~~the~~ ^{near} across wilderness classification and the Gila River from ~~the~~ Road Canyon to the west of the Middle Box, the San Francisco River from Spring Hot Springs to old Arizona Line down Wild and Scenic River classification.

FOREST SERVICE RESPONSE TO LETTER 42

42-1

The draft Plan and the Proposed Action Alternative were for a 10 year period, but because of the economic modeling and the long range effects of some proposed activities, longer periods of time had to be evaluated and displayed. The Plan is for a 10 year period and will be redone every 10 to 15 years. We believe this will keep the Plan current and will provide opportunities to respond to changing issues and concerns.

42-2

Alternative F, as stated, has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

42-3

The original Proposed Action Alternative would have resulted in the saw-timber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified, resulting in a Proposed Action Alternative with an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal below the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

It is true that timber activities do result in additional soil loss. This soil loss, however, will be minimized through the use of Best Management Practices (practices designed to minimize the effects of nonpoint pollution, in this case sediment, sources.) This will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long term productivity.

42-4

We have re-evaluated our non-wilderness recommendation for the two Wilderness Study Areas and feel that the non-wilderness recommendation is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

42-5

The eligible portions of the San Francisco and Gila Rivers, as described in Table 35 and 36 of the draft Environmental Impact Statement, were re-evaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic Rivers Act. Please refer to the Proposed Action Changes Summary at the beginning of the document for a detailed discussion of the decision concerning wild and scenic status of the San Francisco and Gila Rivers.

LETTER 42

FOREST SERVICE RESPONSE TO LETTER 42

Increasing the opportunity for motorized off-road activity will increase erosion. Putting more emphasis on motorized activity will create erosion maintenance -

6

I can't see the justification for spending public money to build roads in current roadless mountain areas to open new areas to steep slope logging, when current leases go unbid upon. It is not likely in the foreseeable future that there will be a demand for timber on the steepest, expensive to deliver to market, timber

7

found on the steep slopes of the Gila National Forest. Another point I'd like to make is in none of your proposals did I see a mention of increased trail maintenance. As there is an increasing number of backpackers, horsepackers, hikers & fishermen using these areas I would like to see the trails better maintained, not just the most heavily used ones in the wilderness, but the trails throughout the system. I know of non-wilderness trails on the ~~Forest~~ ^{Plateau} range that probably haven't been maintained in 20 years and are very bad to follow.

8

42-6

ORV use is recognized as a form of recreational experience. The Plan addresses this issue by permitting such use to occur as long as it does not higher level of maintenance on trails defined to be part of the permanent trail system.

produce resource damage. The Plan does not emphasize this type of use. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

42-7

We disagree that there will not soon be a market for the timber found on the Gila National Forest. Due to the increased demand for lumber resulting from increased housing starts, Southwest Forest Industries recently put on two shifts at their Reserve sawmill. This mill is supplied almost 100 percent by timber from the Gila National Forest.

As a result of your concern and the concerns of others, we tested the economical efficiency of logging cable areas [steep slope] and non-cable areas. We found that with the Forest providing 30 MMBF of sawtimber in the first decade and with the new timber benefit values used in the final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with costs. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with tractor only yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than indicated in the final Plan. This is because of the relatively high volumes per acre on some of the steep slope portions of the Forest and the fact that less miles of roads are often required when combining tractor and cable logging. These results are consistent with experience on other forests in New Mexico. There appears to be a common assumption that cable logging is inherently uneconomical. However, review of specific timber sales has shown the assumption to be incorrect. The economics as well as other potential benefits of cable logging need to be examined on a specific case-by-case basis. (A more detailed explanation is included with the response to the CHEC comments with letter number 1.)

Considering the concern by your organization and others for steep slope logging on the Gila, and the fact that the timber industry has made a financial commitment to log such areas (through the purchase of equipment) we felt that a constrained level of 5 MMBF logged per year with cable systems was a good compromise level. This level was also determined by considering your concern for acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage is required than if a comparable volume was taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent sloped areas and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would have to be managed in all of the Logical Timber Management Areas on the Forest. We did not feel that doing this would be very responsive to your concern related to entering presently undeveloped areas. Logging some cable volume results in less acres being logged in the first decade and more area remaining unharvested.

42-8

The proposed Gila National Forest Plan recognizes the need to increase trail maintenance. Both of these activities have been increased in the modified Proposed Action Alternative. The proposed trail maintenance budget is approximately 288 percent higher than the 1984 trail maintenance budget. This will probably not completely stop the reduction in trail miles over time since some of the trails on the Forest were constructed for activities that can be accomplished on roads, but it should provide for a significantly

LETTER 42

FOREST SERVICE RESPONSE TO LETTER 42

In answer I'd like to see the opportunity for motorist recreation to stay because it's good and the opportunity for enjoying non-motorized recreation to be enhanced as this is the ~~best~~ ^{best} what draws people to the whole Forest in the first place. Alternative F seems to come closest to ~~being~~ promoting amenity resources. I support Alternative F.

In closing I'd like to urge you to extend the public comment deadline by six months and to have public hearings on the alternatives. I find that the overwhelming majority of people are unaware of your 50 year plan.

David L. Miner ~~San Francisco~~
N.M.

42-9

We feel that the modified Proposed Action Alternative may actually address your concerns better than Alternative F. Some increased area would become available to ORV use when roads are built and closed at the termination of the timber sale activities, but this also happens in Alternative F. In Alternative F, wildlife diversity is increased by conducting timber activities in most of the 0 to 40 percent slope timber areas on the Forest. These activities are designed to increase diversity, but at the same time, it requires timber activity and road building into most portions of the Forests suitable timber. The Environmental Impact Statement projects construction of 745 miles of roads in order to implement Alternative F.

By contrast, the modified Proposed Action Alternative projects road construction to result in 630 miles of new roads. The projected difference in road miles is the result of logging steeper slopes affecting fewer acres and requiring fewer miles of roads. Approximately 65 percent of the roads constructed would be closed after timber activities are completed. The modified Proposed action results in the development of only 3 percent of the presently undeveloped acreage on the Forest in the first decade. The remaining area could be reconsidered for wilderness when the plan is revised in 10 to 15 years.

Alternative F has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides a better level of overall net public benefits than Alternative F.

FOREIGN - FARM - DOMESTIC

MIMBRES GARAGE



000 43

10/8/85

Kenneth Scoggins,

After reviewing the draft Summary, I feel that proposal F is the most economic and best proposal listed.

The total economics include the repairs from flood damage which we have all personally, or through ~~the~~ state or federal help, had to bear.

The least amount of disturbance to the watershed is what we deserve.

The wilderness is our biggest potential drawing of people visiting this area. I will be glad to sacrifice the extra work I might get out of Awd vehicle repair if there are less new roads built in previously undisturbed areas.

Before I close, I should mention I do live on the mimbres River and have experienced too closely the damage to flood bottomland, telephone & electrical poles, vehicles parked a very "safe" distance from the river and the people unwise enough to build too close to the river.

Thanks,

MIKE SAUBER

43-1

We disagree that Alternative F is the best alternative. Alternative F has the highest PMV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

43-2

The original Proposed Action Alternative would have resulted in the saw-timber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative propose an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. One of the results of this decrease in timber harvest program is a decrease in watershed disturbance and soil loss. The first decade soil loss from timber activities is projected to be 43 percent less in the modified Proposed Action Alternative than it would have been in the original Proposed Action Alternative. Please refer to the Allowable Sale Quantity and Change in Effects of Timber Harvest section of the Proposed Action Change Summary at the beginning of this document for more details concerning the revised timber program.

43-3

Because of changes in the amount and location of timber harvest activities and changes made as a result of public concerns, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and available for semi-primitive type recreation. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the unroaded areas on the Forest.

LETTER 44

FOREST SERVICE RESPONSE TO LETTER 44

Oct 7, 1985

000 44

GILA NAT FOREST
- PER 150
2610 SILVER ST
SILVER CITY, NM

I would like to comment on your recent Forest Master Plan. The preferred alternative is more of the same of managing the forest for local interests and short term commodity values rather than managing for long term watershed, conservationist and wildlife values. I especially deplore plans to increase grazing of cattle at a time when demand for beef ^{is falling} and new awareness of saturated fat and cholesterol risks are making the general public aware of the high social costs of beef consumption. These newly understood costs should make their appearance in the Forest plans analysis of cost/benefit of grazing. As with logging, grazing seems more of a welfare plan for ranchers than a legitimate economic use for our national forests.

44-1

As a result of public concerns related to the Proposed Action Alternative in the draft Environmental Impact Statement, several changes have been made. These changes should help resolve some of the concerns that you expressed. For an explanation of the changes, please see the "Summary of Changes" included at the beginning of this document.

44-2

We disagree that livestock grazing is increased in the Proposed Action Alternative. In the Proposed Action alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and align permitted numbers with capacity by the end of the second decade. Substantial improvement will occur in the first decade.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National Forest for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

44-3

Also to be deplored are plans for increased logging, and clear logging. Especially cynical are tourist impact views that beauty borders, used in high traffic areas to conceal the logging and destruction from the casual forest user, of visitor cosmetic diversity at the edge of the woods, and a scenery manager resource in an above board way, open to public view.

Enough for abandoned old fencing and too much grazing, the latter view, I have visual scenery fine and beautiful.

Apparently flourishing with a mostly light hand of management is many areas not wilderness designated that appear to have been heavily abused in the past today for me provide a very satisfactory natural environment for hiking, outdoorsman activities. Thank you.

To conclude, of the alternatives provided, F is the one closest to my management preference. Our national forest its natural heritage, irreplaceable, habitat for endemic species, as a place for solitude, exploration, and wonder by us humans as visitors is the highest value for management consideration. The highest use value is in my opinion watershed. The lowest use values are mining, logging, grazing, these need to be de-emphasized.

Herb Marsden
1005 GOLD
88061

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems was a concern expressed by a number of individuals. In re-evaluating the Proposed Action Alternative it was determined that the most cost efficient method of obtaining the 30MMBF objective in the Proposed Action Alternative was to log some portion of the volume from steep slope areas. This is because steep slope areas on the Forest often have relatively high volumes per acre, and logging steep slope areas in conjunction with less than 40 percent slope areas, often results in construction of fewer miles of roads per thousand board feet of volume harvested. In order to respond to the concerns regarding steep slope logging, the economic model used in forest planning was constrained to allocate the harvest of no more than 5MMBF from steep slope areas. This resulted in steep slope harvest in the modified Proposed Action Alternative at a level 59 percent of the level projected in the original proposed Action Alternative. The Forest management team feels that the use of cable systems should be pursued. In the long term, cable harvest could result in the construction of less miles of roads and less roading of presently unroaded areas when compared to harvesting the 30MMBF from only the 0 to 40 percent slope areas. The use of cable systems on steep slope areas could eventually result in their use on the 0 to 40 percent slope areas as well. This could provide positive environmental benefits.

In addition to your comment regarding cable logging, you also commented on visual quality management activities. We disagree that visual quality maintenance activities are designed to conceal "the rape and destruction from the casual forest user". First of all, we are not ashamed of our management activities as you seem to infer. Our management decisions and the activities that result from these decisions are always open to public review. Secondly, visual quality management activities are not used to hide other management activities, they are used to manage a resource. Just as timber activities are designed to provide for the management of the timber resource on a sustained yield basis, visual management activities are designed to maintain visual quality [the visual resource]. Visual considerations are an integral part of management of the Forest's resources and legitimately should be.

44-4

Alternative F has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest [plant diversity, wilderness, wildlife habitat, etc.]; however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. Alternative F is also not the best alternative in addressing the concern many people expressed in relation to maintaining certain unroaded areas in an unroaded condition. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

LETTER 45

FOREST SERVICE RESPONSE TO LETTER 45

UOW 45

P. O. Box 1162
Deming, New Mexico 88030
October 2, 1985

45-1

Thank you for your comment.

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Forest Supervisor:

It is sad that the new draft Management plan for the Gila National Forest is taking shape under the supervision of the most anti-environmental administration of all time, the Reagan regime.

In recent months, I have written two newspaper stories in support of greater protection for the forest.

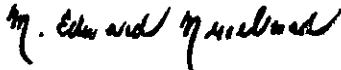
I can furnish no better expression of this point of view than to forward these articles to your office.

Both the Mogollon and Gila Forest items speak for themselves; but, as the former shows, continuing oversight will be necessary to preserve the historic mountain town for the National Register of Historic Places in Washington, D.C.

With sincerest thanks for extending the comment period for another 30 days, I close with a quotation from wildlife biologist Olaus J. Murie:

"I am urging, with no apology, attention to our mental, spiritual welfare, the most vital problem facing us today....Not the mere conservation of coal, of wood, and the material necessities of our daily lives, but the conservation of the sources of inspiration. And we cannot save the situation by juggling words."

Cordially,



M. Edward Nesselroed

Enclosures

GILA NATIONAL FOREST
DEMING, NM 88030

OCT 04 1985

RECEIVED

LETTER 46

FOREST SERVICE RESPONSE TO LETTER 46

NEW MEXICO NATURAL HISTORY INSTITUTE
A Nonprofit Corporation

St John's College Campus
Santa Fe New Mexico 87501

000 46

5 October 1985

Supervisor
Cila National Forest
2610 N. Silver Street
Silver City, New Mexico 88061

Santa National Forest
Silver City New Mexico Forest Planning

OCT 08 '85

Sir

DATE RECEIVED

We discuss briefly (1) the Proposed Action and our preferred alternative and (2) biogeography of the National Forest, then (3) we comment on specific areas of interest to this Institute's goals, which concern preservation of representative and unique examples of New Mexico's natural features, especially biological communities

1 However well aligned with directives from Washington, increased commodity production--especially timber--in the Proposed Action does not appear economic or wise. Timber operations on national forests in Region 3 are heavily subsidized even in those instances where sales are not obviously at a deficit. To undertake increased cutting is to resist the free-market trend, which would concentrate timber-cutting in the Southeast and the Pacific Northwest. We favor the goals of Alternative F, with no steep-slope logging. In Region 3--at least south of the Santa Fe and Kaibab Forests--wildlife and watershed protection and

46-1

After reading your comment, we feel that you have three primary concerns relating to timber production on the Forest. These are the level of harvest, subsidized timber activities (economics) and steep-slope logging.

As a result of concerns regarding the level of timber harvest on the Forest, the projected harvest level has been reduced. The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 48 MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative Projects an allowable sale quantity of approximately 30 MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 10-15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan. Please refer to the "Summary of Changes" at the beginning of this document for a more detailed discussion of proposed timber program.

You also suggest that timber operations should not be subsidized. As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber contractors or any other interest group as being the sole recipients of a federal subsidy. Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

In your comment, you state that you favor Alternative F with no steep slope logging. Alternative F results in timber activities on 303,000 suitable acres. The modified Proposed Action Alternative will result in timber activities on 272,000 suitable acres. While Alternative F results in the largest increase in wildlife habitat diversity, the modified Proposed Action Alternative is projected to reduce total unroaded acres by only 10 percent in 50 years (only a reduction of 3 percent in first decade). Wildlife considerations would be relatively high on the areas being logged. As a result, we feel that overall the modified Proposed Action Alternative provides a higher level of net public benefits than Alternative F.

Cable logging is part of the reason that the Forest could meet a 30MMBF target level for timber and still retain as much of the existing undeveloped area. As a result of cable logging concerns, we tested the economical efficiency of logging cable areas and non-cable areas. We found that with the Forest providing 30 MMBF of sawtimber in the first decade and with the new timber benefit values used in the final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with cost. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with only tractor yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than the volume in the modified Proposed Action Alternative. This is because of the relatively high volume per acre on some of the steep slope portions of the Forest. These results are consistent with experience on other forests in New Mexico. There appears to be a common assumption that cable logging is inherently uneconomical. This assumption has been apparent in reviews of New Mexico Forests by CHEC. However, review of specific timber sales has shown the assumption to be

recreation should, we think, be paramount. We think that off-road vehicles should be excluded from additional large wildlife areas and from meadows and steep slopes that are being damaged.

2. The Region's only "endemic" ecological province is Bailey's Upper Gila Mountains Forest Province, in New Mexico restricted to Gila and Apache National Forests. This province is characterized by a mix of southern and northern species (such as Chihuahua and Arizona pines at their northern limits, common juniper at its southern limit) with ecotypes adapted to the area's arid foresummer. Examples of these forest types are included in the Gila and Aldo Leopold Wildernesses, but should also be recognized by research natural area designations. Strangely, the Proposed Action's five existing or proposed RNAs include none of the forest types that characterize the province, but only grassland, woodland, and scrub formations. We propose that additional RNAs be found to include forests in the ponderosa pine belt (especially with Arizona pine), in the mixed conifer zone (especially with southwestern white pine), and in the spruce-fir zone (especially with corkbark fir).

3. from north to south

a and b. Largo Mesa and Agua Fria Mountain RNAs (proposed) look good, from the descriptions, and we support their designation though we have not inspected them.

c. There should be an RNA, probably in Management Area 3B, to protect at least 640 acres of the fine mixed conifer stands of Apache National Forest. The chosen area should have relatively much southwestern white pine.

Gila Forest Plan, 2

d. Frisco Box (Upper San Francisco Box) should be protected as a semi-primitive non-motorized area, or some such designation, at least the canyon itself and some fraction of surrounding Roadless Area 3-146. This is a beautiful area with hot and cold-running springs and rugged slopes in several areas. The riverside should be temporarily protected from livestock as necessary for tree growth.

incorrect. The economics as well as other potential benefits of cable logging, need to be examined on a specific case-by-case basis. [A more detailed explanation is included with the response to the CHCC comments--number 1]

Considering the concern by your organization and others for steep slope logging on the Forest, and the fact that the timber industry has made a financial commitment to log such areas (through the purchase of equipment), we felt that a constrained level of 5 MMBF logged per year with cable systems was a good compromise level. This level was also determined by considering your concern for acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage would be logged when compared to the volume taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent slopes and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would have to be managed in all of the Logical Timber Management Areas on the Forest. We did not feel that doing this would be responsive to concerns related to entering presently undeveloped areas. Logging some cable volume results in less acres being logged in the first decade and more area remaining unharvested.

46-2

We disagree that the Forest should be closed to ORV use except in specific areas designated as closed. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require additional closures, specific areas will be closed or restricted to ORV use.

46-3

As you stated in your response, there are examples of Bailey's Upper Gila Mountain Forest Province ecological province within the Gila and Aldo Leopold Wildernesses. These areas are protected as a result of Wilderness designation. We do not feel that another designation would significantly add to their protection. As a result, we do not see a need to designate a RNA within the Wilderness.

46-4

All of the presently unroaded area in Management Area 3B will be managed to maintain semi-primitive recreation opportunities for the first decade. The appropriateness of designating a specific area within the unroaded portion as an RNA can be evaluated when a new plan is developed in 10 to 15 years. This data is not presently available.

46-5

Out of the 40,050 undeveloped acres around the Frisco Box, only 1950 would be affected by a timber sale in the first decade. The remaining acres would be managed to maintain their semi-primitive recreation opportunities.

The eligible portions of the San Francisco and Gila Rivers, as detailed in Tables 35 and 36 of the draft Environmental Impact Statement for the Plan, were reevaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic

Rivers Act. The determination was made that the Rivers do not contain the characteristics required for Wild and Scenic designation. The rationale is explained in the information provided in the "Summary of Changes" section at the beginning of this document.

LETTER 46

- e. We support Wild and Scenic designation for most of the San Francisco River in New Mexico.] 6
- f. There should be an RNA in the Tularosa Mountains, probably in Roadless Area 3-150, to protect an example of aspen-mixed conifer-common juniper forest, here at its southern limit.] 7
- g. A section of spruce-fir in the Mogollon Mountains should be designated an RNA. While it's true that spruce-containing RNAs are being recommended on Carson and Santa Fe National Forests, one sample per broadly defined forest type is not enough. Habitat types in the Gila highlands differ from those elsewhere. (Similar remarks apply to our mixed-conifer and ponderosa pine recommendations.)] 8
- h. A section rich in Arizona pine should be designated as an RNA. This distinct species or variety is usually found at the moister edge of the ponderosa pine belt. We have found good stands in the Rocky Canyon area along N.M. 61 and in the Pinos Altos Mountains, but have not identified the best uncut stand for an RNA.] 9

FOREST SERVICE RESPONSE TO LETTER 46

46-6

We have reviewed the potential Wild and Scenic River sections in the Forest and feel that they should not be recommended for classification. Our rationale is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

46-7

An area of National Forest may be designated as a Research Natural Area (RNA) if it possesses a unique ecosystem type which will contribute to the National Research Natural Area System. Since the identification process is a Regional process, we do not feel that it is appropriate for us to recommend additional RNAs in the Plan that have not been studied as part of the Regional RNA reports. We do recognize and appreciate the input we have received on this subject. To insure that this input is not lost, we have added a new standard and guideline to each one of the management areas containing areas recommended for classification as RNAs. An example of the way these standards and guidelines are written follows:

Inventory the Eagle Peak area to determine if part of the area should be considered for RNA designation (aspen-mixed conifer-common juniper forest). If any areas appear to qualify, make a recommendation to the Regional RNA study committee so the areas can be evaluated in relation to other areas in the Region.

46-8

Unmodified examples of spruce-fir forests are included in the Gila Wilderness. These areas are already protected from unnatural modification. We do not feel that an additional "RNA" designation will add to the protection that these areas already have.

46-9

A standard and guideline similar to the one shown in our response to your comment number 7 will be added to Management Areas 5B and 7E.

46-10

We disagree that the Lower San Francisco Wilderness Study Areas should be recommended for Wilderness designation. Please refer to the Wilderness Study Area section of the "Summary of Changes" at the beginning of this document for the rationale concerning this recommendation.

Since your comment referred specifically to the ORV use of the San Francisco River, the rationale for dropping the seasonal closure of the River is provided.

The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the canyon, but to all unauthorized entry, including recreational hiking. Since the closure was enacted, a study of the canyon prepared by the Museum of Northern Arizona (Riparian Ecology of the San Francisco River; Carothers, Steven W., et al., 1982) indicated that at that time, the Black Hawk was not nesting in the main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the river is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainage of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the ORV use of the canyon may cause erosion of the river benches. This conclusion was made by the biologists who did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly effected the natural erosion rates. Based on the available data and because ORV use of the canyon has decreased since these studies were conducted, we have no resource reason to continue the seasonal closure.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

46-11

No development activities are planned in this area in the first decade. A standard and guideline similar to the one shown in response to your comment number 7 has been added to Management Area 4C.

46-12

We disagree that the Hells Hole Wilderness Study area should be recommended for Wilderness designation. Please refer to the Wilderness Study Area section of the "Summary of Changes" at the beginning of this document for a more detailed discussion of this recommendation.

No development activities are planned in this area in the first decade. A standard and guideline similar to the one shown in response to your comment number 7 has been added to Management Area 4C.

i. San Francisco Lower Box should be a wilderness. If not designated wilderness, it should be closed year-round to vehicles for protection of riparian vegetation and wildlife.] 10

j. The box-canyon part of Mule Creek above its confluence with the San Francisco should be given special protection, perhaps as a Botanical Area or RMA. This is the handsomest, richest riparian hardwood stand that we know of on the forest. If vehicles are not excluded from San Francisco lower Box, the Mule Creek Box should be fenced at the San Francisco and closed to vehicles.] 11

k. We favor designation of Hell's Hole as wilderness. If that is not done, then other protective measures should be taken, including exclusion of vehicles. A Pinyon Research Natural Area should be established in Tillie Hall Canyon to protect the only known stands of mixed 1-, 2-, and 3-needle pinyons and associated desert scrub.] 12

LETTER 46

FOREST SERVICE RESPONSE TO LETTER 46

46-13

ORV use is presently not a problem in the Rabbit Trap area. Posting the area with ORV closure signs would only attract attention to the area. As a result, we do not feel that an ORV closure would add to the manageability of the area. If ORV use begins to be a problem, the Plan will be amended and the area will be closed.

46-14

The Gila River was considered as a candidate for study as a Wild and Scenic River; however, initiation of the study was dismissed. Please refer to the "Summary of Changes" section at the beginning of this document for a discussion of this recommendation.

46-15

We agree that the Burro Mountain portion of the Gila River is an important area for a large variety of wildlife. We feel that management of livestock use of the area is important in order to maintain these habitats, but we do not feel that livestock need be totally eliminated. A large portion of the riparian habitat to which you refer is within the Gila Bird area. This area has been fenced. Cattle grazing is allowed at intervals to harvest a portion of the forage, but the use is controlled to insure riparian condition improvement. There has been a substantial improvement in riparian condition since this management strategy was implemented.

We agree that the past level of livestock grazing in the the RNA was not appropriate. Until recently the area was grazed during the growing season. This situation has been changed in the 1984 management plan. The area is still grazed but only two out of three years. It is no longer grazed during the growing season. As a result, some improvement in riparian conditions should begin to occur.

Even though the management on this area has been changed to improve the riparian conditions, it should be noted that this RNA was not established to protect an unmodified example of a riparian ecosystem. The establishment report for the area states that "the principal value of the area is habitat for a particularly rich and unique avifauna". Riparian habitats are one of the important habitat components, but the area did not represent an unmodified riparian condition when it was established. Since the riparian zone was not in excellent condition at the time this RNA was established, we do not feel that grazing since that time has significantly detracted from the "principal value" for which the area was established. We do, however, feel that the "rich and unique avifauna" will benefit from the improved riparian habitats that is one of our management goals in the 1984 range management plan and in the Forest Plan.

1. Turkey Creek RNA, as proposed, will be an unusually valuable research area.

m. Rabbit Trap RNA will be valuable for research on several vegetation types, mainly because of the long-term grazing exclusion. ORV exclusion should be shown on the ORV map, as it is for Gila River RNA.] 13

n. We favor designation of the Gila as a wild and scenic river] 14

o. All possible measures should be taken to protect the Gila Middle] 15

Gila Forest Plan, 3

Box's astonishing variety of wildlife, from rare minnows and Gila monsters to good populations of javelina, two deer species, bear, cougar, and probably cottontails. Livestock should be excluded from the river valley and from lower parts of side canyons to protect riparian vegetation. (That grazing continues fairly heavy in Gila River RNA, after all these years under "protection," does not speak well for the Forest's ability to manage additional RNAs.) A zoological or special wildlife-habitat area should be designated.

We wish you well under the barrage of competing interests, of which our comments report one small segment. We feel sure that protection of the relatively small areas proposed, for scientific purposes, will stand up as the rational choice against any competition.

Sincerely,


Roger S. Peterson
Secretary

000 47

October 7, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir,

I am writing in response to the Summary of the Draft Environmental Impact Statement for the Gila National Forest Proposed Plan. After studying the subject document (hereafter referred to as "the Summary") in as careful a manner as time would allow (I received my copy on 9/14/85), I feel I have developed at least a small appreciation for the difficulties, both technical and political, of the task you have undertaken. The task is not only difficult, but also very heavily laden with responsibility because of the far-reaching impact of the policies implemented as a consequence of the study. Knowing also that the reputation of the Forest Service in general as well as that of all those directly responsible will be affected by the success of this project, I have no doubt that you are personally committed to the formulation of a plan which will optimize public benefits within the constraints of sound economic and environmental practice. I am grateful for the opportunity to respond to this issue and I trust that my comments will be given careful consideration.

Let me state very clearly at the outset that based on my study of the Summary I am constrained to oppose the Preferred Alternative because the Summary fails, in my opinion, to establish beyond reasonable doubt that the Preferred Alternative is actually superior to the others. My recommendation is that the decision-making process be halted until certain questions regarding the Preferred Alternative can be resolved or the Alternative modified if this cannot be done I would recommend implementation of Alternative F instead of the Preferred Alternative.

One serious question I have is with regard to the concepts of supply and demand. On page 4 the estimated demand for sawtimber is given as 48 MMBF in period one and 99 MMBF in period five. I assume these are per annum. There is no word given on how these estimates were arrived at until page 24, where we are told that the demand for timber is expected to be proportioned to population growth and the building market. I fail to understand the reason

for treating this estimated demand as an absolute constant which we must strive to supply though it means conducting logging operations on 98% of the theoretically productive lands. Demand is anything but constant. It is very strongly influenced by price. The demand for free timber would be virtually unlimited, I'm sure. On the other hand, if you try to sell timber at ten dollars per board foot you'll find the demand to be zero. Demand should therefore be plotted on a graph as a function of price. SEE NEXT PAGE

Similarly, supply is not fixed, but is a function of how much money you are willing to invest in production. SEE NEXT PAGE

If all the costs of producing timber are included in the supply graph, the two curves can be superimposed to give the optimal revenues. I would think this kind of analysis would be fairly common business practice, but summary gives no indication of it having been applied to the timber issue in the Gila or any of the other issues, for that matter.

47-1

In response to public concerns regarding the original Proposed Action Alternative, several changes have been made to the Proposed Action Alternative presented in the final Environmental Impact Statement and the Forest Plan. The Proposed Action Alternative Summary of Changes is located at the beginning of this document.

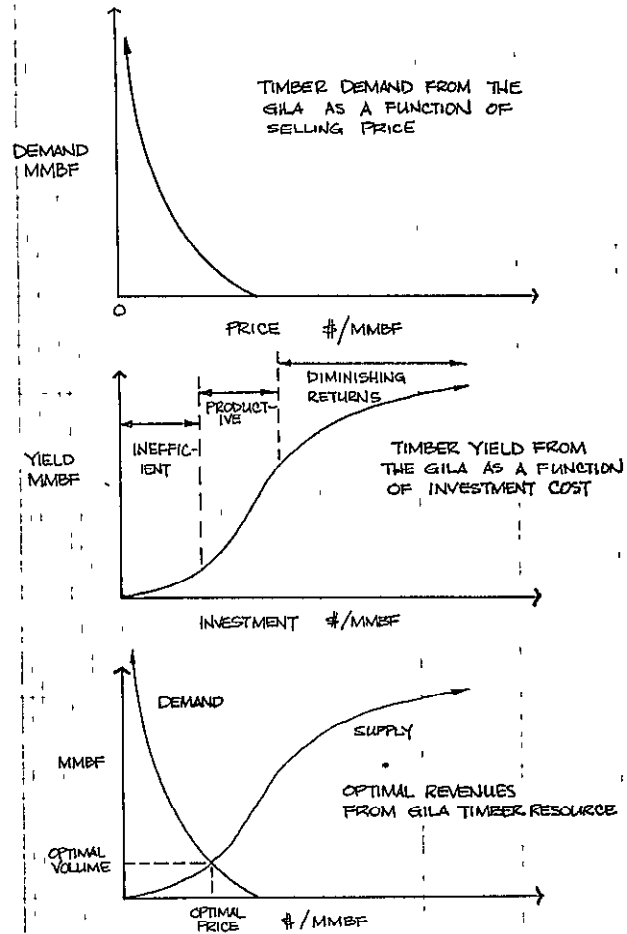
47-2

Your general description of the concepts of demand and supply are correct. Ideally, the Forest analysis of all resources would be carried out in a similar fashion. The difficulties inherent in such an approach are not often recognized, however. For example, the concept of economic demand is usually depicted as a linear relationship between price and quantity. In an economic context, the demand for a good is usually said to be dependent upon the price of the good, the relative prices of all substitutes for the good, the relative price of all other goods, the income of consumers, the tastes and preferences of all consumers, and technological change. Thus the relationship between price and quantity is but one of several possible explanatory variables which affect the economic demand for a goods. As can be visualized, the actual quantification of these variables to arrive at "demand curves" for a particular goods and projecting these into the future is, at best, a heroic task. The Gila did not estimate demand for timber using the explanatory variables which might be suggested by conventional economic theory. Such an approach would result in an estimate of the price/quantity relationship often depicted in conventional supply and demand schedules. However, this methodology is impossible to implement without both extensive funding and time.

The Gila used the approach of examining the historic pattern of sales. The future need figures used in the draft Environmental Impact Statement were based on the timber sold between 1971 and 1980. The data used for this projection is displayed in the draft Environmental Impact Statement in Table 21. Table 21 was also intended to show the timber sold in 1981 through 1984 and the average volume sold during the 14 year period. During the public involvement period, we discovered that the information for the last four years in the table was timber offered, not timber sold. This table has been corrected and a new average has been calculated based on the corrected information for 14 years. This average is considered to be the demand in the first decade. The existing mill capacity is above this figure. Considering the existing mill capacity and the volumes that have been sold in years when the economy was strong, we have now projected the long term demand level to be approximately 30 MMBF. The timber issue discussion has been modified to reflect this level. The Proposed Action has been modified and has an allowable sale quantity equal to the average volume sold in the last 10 to 15 years.

47-3

The volume indicated on page 4 (99 MMBF) was projected based on the historic pattern of sales. As explained above, this projection was determined to be incorrect and has been revised. Please refer to the Proposed Action Summary of Change section located at the beginning of this document. The volume indicated on page 44 of the draft Summary is the projected target level of timber products projected by the 1985 update of the Forest and Rangeland Renewable Resources Planning Act (RPA). The Southwest Region through the Regional Guide assigns each Forest a share of the National RPA Program Target.



NOTE: I THINK IT IS EXTREMELY INTERESTING TO NOTE THAT THE SUMMARY CONTAINS NOT A SINGLE BAR CHART, PIE CHART OR LINE GRAPH NO GRAPHICS OF ANY KIND!

While I'm on the issue of estimated timber demand, why is there such a disparity between the 99 MMBF you show on page 4 for period 5 and the 56 MMBF shown on page 44 as having been established as the RPA target for the same period? I guess what I'm trying to say here is that I'm not convinced that there will really be that high a demand for timber on the Gila, especially since it's bound to be expensive

This brings us to another point. How much is it going to cost to develop 98% of the potentially harvestable stands of timber? I would think that the cost of harvest, silviculture, and environmental protection, not to mention the loss of visual quality and recreation opportunity, would really skyrocket as you approach 100% productivity. This is especially true since the yield per acre under Alternative PA is supposed to be lower than it might be in order to soften environmental impact. We can only speculate about cost at this point, however, because the Summary does not contain an itemized budget for each Alternative. A rather important item to overlook.

This brings us to the next point. Although the Summary unfortunately does not contain an itemized budget for each Alternative, it does contain a total budget for each Alternative and this is found on page 14, Table 3. A close examination reveals a rather startling footnote: "Costs to implement the Alternatives vary only slightly because of the budget constraints." If I understand what I read, you are saying that your estimated cost of operation is conditioned upon your anticipated operating budget. This seems rather like putting the cart before the horse. I thought you figured the cost first, then checked the budget to see if you could afford it. Maybe this is how deficit finance works?

If I am to approve of a plan which calls for such an intensive timber harvest, I want to be assured that the dollars are budgeted for environmental protection and sustained productivity. The Summary does not provide this vital information. On page 42 there

47-4

The timber benefit values were re-examined and revised downward. The timber values originally used in the Plan were calculated for time trend analysis of Region-wide (Arizona and New Mexico) sales data for 1958-1979. Based upon this trend, benefit values were projected to increase over time. The

timber analysis results in the revised Proposed Action reflect these and other changes. The revised demand and benefit values result in significant reductions in the number of acres managed for timber production in the revised Proposed Action. As a result, only eight percent of the entire Forest will be managed for timber production (approximately 272,000 acres out of 3.3 million acres or 63 percent of the tentatively suitable acres). The original Proposed Action called for timber management on 432,000 acres. Other important changes are shown in the Proposed Action Changes Summary at the beginning of this document.

47-5

In the development of the Forest Plan, multiple prescriptions were developed for various areas of the Forest. These prescriptions allowed us to analyze the costs of providing various combinations of goods and services from different portions of the Forest. Prescriptions included all costs of obtaining various levels of goods and services and for protection of the environment. When alternatives were developed, we told the economic model used for planning that we could only spend a certain amount of money. This was the budget constraint imposed in order to assure that all alternatives were implementable. We then told the economic model that we wanted to meet certain objectives for a particular alternative. The economic model told us if the objectives could be met within the budget constraint. If the objectives could be met, it allocated prescriptions to specific areas in the combination that most economically met the objectives, and it told us the costs to accomplish the objectives. If the objectives could not be met within the budget constraints, we modified the objectives until the alternative could meet the budget constraint.

This was not putting the cart before the horse as you suggest. The operation cost was not conditioned upon our anticipated operating budget. The potential levels of goods and services that could be provided from the Forest were conditioned by an anticipated feasible budget level. Combinations of goods and services changed between alternatives, but the combination always had to be within a range that was dictated by feasible budget levels.

47-6

All of the prescriptions developed for the Forest contain all of the costs necessary for environmental protection and sustained productivity. Therefore, the plan contains these costs.

47-7

This statement is an extension of the first part of that paragraph. Only the market or assigned prices or outputs for which prices can be estimated are counted as benefits in the FORPLAN model. The quality of resource management (those nonquantifiable activities) that may accompany changes in levels of outputs but that do not affect the level of output, are not reflected in the assumed prices. An example would be the variation in the quality of a recreation experience. It is not reflected in the price.

is yet another frightening hint that the economic analysis may not be complete. In the discussion of economic efficiency analysis we find this sentence "Differences in the quality of resource management that may accompany changes in levels of outputs are not reflected in the prices." Does this mean that the cost of the increased management activity which must accompany increased output is not considered? Also, on page 44 there is a footnote to Table 17 which indicates that only 15% of the acres upon which timber operations are to be conducted will be artificially reforested. This seems rather small, and nothing more is said to justify the figure.

One of the important areas of possible conflict over this timber issue is the visual impact. Once again, I do not feel the Summary has provided adequate information to show that the visual impact under the Preferred Alternative is held to acceptable levels. First of all, there is no definition of the Visual Quality Indices listed on page 20. It is quite annoying to have these terms used earlier in the text with no hint whatsoever as to their meanings. Even when one sees them listed on page 20 one can only speculate as to their exact meanings. On page 35 there is a discussion of the environmental consequences to the visual resource. It's a mystery to me why Table 14 shows plus and minus symbols only, rather than tabulating the numbers of acres to be classified under each level of visual quality for each Alternative. The whole issue is then sidestepped by the assertion that "irretrievable commitment of the visual resource was not considered to be measurable" (see page 35). I am not satisfied. Surely the application of a little imagination and energy would yield a suitable method for evaluating this important issue.

47-8

Most timber stands on the Forest are managed using the shelterwood silvicultural system. In this system, the final removal of the overstory is not accomplished until regeneration is established. The site's microclimate is preserved by leaving a partial overstory. This overstory also provides a seed source. As a result, regeneration can often be established naturally. In order to obtain full stocking, some stands or portions sometime need to be planted. This is the 15 percent in the footnote you referenced.

47-9

Specific details regarding the visual impact can be found in the final Environmental Impact Statement and on a management area by management area basis, in the final Forest Plan. In an effort to keep the summary short and concise, much of the detail was eliminated. Please refer to the complete documents for a thorough discussion of the alternatives considered in detail and increased detail concerning the management activities proposed for the Forest.

47-10

Changes made to the Proposed Action Alternative have resulted in a decrease in soil loss. For example, timber harvest on fewer acres than proposed in the original Plan should result in a 43 percent decrease in on-site soil loss from timber activities. Construction and reconstruction of fewer roads and the closure of roads, when no longer needed for administrative purposes, should result in approximately 35 percent less soil loss from roads than originally projected.

A reader may instinctively feel that logging operations on steep slopes would contribute more to soil erosion than a herd of cows. On a specific area, this may be true. However, the reader also needs to consider that timber impacts are of short duration and result in effect is a relatively small portion of the Forest. Soil loss from areas grazed may be at an acceptable level or an unacceptable level, but when the area effected is considered [cattle grazing occurs on the majority of the Forest], the total soil loss is much more significant. We also need to note here that the removal of timber from steep slopes using cable logging techniques actually results in less soil disturbance than conventional logging methods.

You also expressed a concern regarding watershed condition. It is assumed that the recovery of satisfactory watershed acres will coincide with the recovery of satisfactory range acres, at a point 50 years beyond the point livestock numbers are balanced with forage capacity. This time delay is the reason Alternative F and Current are nearly the same in the first decade. Differences appear after the first decade. Past the first decade, satisfactory watershed acres increase faster in Alternative F than in Alternative A.

The question you ask relating to how much soil loss is acceptable is not possible to answer on a Forest Wide basis. It depends on many factors including the depth of existing soil, how fast soil is forming, etc. We feel that the summary adequately displayed the fact that under all alternatives soil loss will decrease and soil productivity will be maintained. In addition to the information in the summary, the Forest Plan contains a standard and guideline that states that "Through the use of best management practices, the adverse effect of planned activities will be mitigated and site productivity maintained. Soil loss, due to management, will not exceed soil loss tolerances." This statement provides additional assurances and directs management practices as they relate to soil loss.

LETTER 47

FOREST SERVICE RESPONSE TO LETTER 47

Another issue which I question in regard to timbering is the matter of soil erosion. The Summary indicates on page 26 that soil erosion is currently at unacceptable levels on about one third of the acreage. On page 39 we find that the Preferred Alternative ranks last in addressing this problem. On page 4 we find that by the fifth period soil loss is still 15 2 MM TONS, down from 18.3 in period one. This seems like a small reduction over fifty years. (By the way, did you notice how one bit of information was found on page 4, another on 26, and another on 39? I find this to be typical of the way in which information is scattered around in this report, making it unacceptably difficult and time-consuming to analyze)

The manner in which the soil loss issue is treated seems to indicate that the Forest Service did not visualize the reader's attempts to make a genuine study of these Alternatives. How are we to compare the soil loss under the Preferred Alternative to the currently unacceptable volume? The current soil loss is not given in comparable terms to the projected soil loss. And what about this: wouldn't you expect the reader to instinctively feel that logging operations on steep slopes would contribute more to soil erosion than a herd of cows placidly chewing their cud in the meadow? Yet the discussion of soil erosion on page 39 is almost totally in terms of grazing impact. Also, if Alternative F stresses watershed (among other things) (page 0), why is the satisfactory watershed condition the same for it as for the no action alternative (Alternative A) which currently allows the unacceptable condition? How much soil loss is acceptable? How fast is topsoil reproduced in the Gila? The Summary should convince and assure the reader of these things, not just assert that benefits will be maximized and undesirable effects will be mitigated.

I have a host of questions on recreation which time will not permit me to discuss here. Why does the Gila fail to meet the current demand? Why continue the trend? Is the projected demand established by RPA so far out of line? How do you propose to close logging roads to four wheel drive vehicles? I doubt of land mines would keep them out! Referring to the discussion of dispersed recreation on page 33, doesn't it seem unrealistic to anticipate the same level of use in all Alternatives regardless of the quality of opportunity in each? On another note - why is there not one word of discussion on the pros and cons of the Wild and Scenic River issue?

Perhaps the biggest mystery of all is the economic efficiency analysis found on pages 14, 41 and 42. Alternative F is clearly the best economic choice by PNV analysis and by the resource benefits shown in Table 4. There is a third index of economic efficiency mentioned on page 42, called NPB (Net Public Benefit). It sounds like the best and most useful index possible for determining which Alternative is the best. However, this information was apparently not included anywhere in the Summary!

I only wish I had time to express my objections to the concepts of irretrievable and irreversible commitments, short term and long term productivity, the mining issue mentioned so briefly on pages 39 and 40. I would like to discuss the Wild and Scenic River question, and the Wilderness designation for the Hells Hole and Lower San Francisco acreages which are all treated so lightly by the Summary. Unfortunately, I fear it may be too late to get this letter to you before the deadline as it is, so these questions must remain an inarticulate cry for mercy. (By the way - what a coincidence that the Preferred Alternative maximizes receipts to the U.S. Treasury! In what sense does this really benefit the Public? Which would the man in the street really rather have: the forest primeval or more money in the hands of the government?)

In conclusion, I feel that it would be a tragic mistake to continue planning in the face of these unresolved issues. Please reformulate the Preferred Alternative or implement Alternative F. With keen interest, I await your response.

Thank you,

John Hurley
John Hurley

47-11

The Gila National Forest does meet the demand for dispersed recreation. The Forest is unable to meet the demand for the specific types of developed recreation that the public desires (i.e., campgrounds near rivers or lakes) because of the scarcity of water resources in the southwest. Wildlife recreation would require a significantly higher budget to provide the habitat necessary to sustain big game numbers at level required to satisfy demand. This would reduce the level of available resources for other resource activities. Since the Forest Service is a multiple use agency, an acceptable balance must be attempted for all resource uses.

47-12

Roads will be closed to public travel using various methods to protect the resources. These methods include signing, blocking and obliteration of the road. We have had good results with these various methods.

47-13

The level of available dispersed recreation opportunities on the Gila National Forest is at a high enough level that it is not likely that the quality of the opportunity will be significantly affected. It is not anticipated that any of the alternatives considered in detail will reduce the quality opportunities to a level that would affect the level of dispersed recreation use.

47-14

A discussion of the sections of the river systems eligible for recommendation to the Wild and Scenic River System is presented in the Proposed Action Alternative Summary of Changes section of this document. Our rationale for not recommending these rivers is also included in the Record of Decision.

47-15

Alternative F has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. Maximizing PNV is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Action provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

47-16

As identified in Table 11 of the draft Environmental Impact Statement, the Proposed Action Alternative actually ranks fourth in receipts to the U.S. Treasury in the first decade, which is the most important time period of this 10 to 15 year plan.

000 48

Mr. Kenneth C. Wiegman
 Forest Supervisor
 Gila National Forest
 2610 North 1st Street
 Silver City, N.M. 88130

Dear Ken:

I appreciate his opportunity to comment on the Draft Environmental Impact Statement, Proposed Gila National Forest Plan, and on the Plan itself. As you know, I have been going over, with Jerry Engel, the errors and cloudy parts. But I found in both documents that I will not correct most of these because they are not in help make a point.

But, I am getting older, and my eyes are not as good as they used to be. But I am sure that the EIS is extremely difficult to read. Chapter 4, of the EIS, and Appendix B + C were impossible for me to read. I didn't give up with the "bureaucratic computer muck" and I can't intelligently read the volume of information included in the documents. I did appreciate the "loose leaf" glossary which you provided which eliminated the need of constantly referring back to the documents. It was a big help. I suggest that you think of furnishing a "loose leaf" summary of the alternatives which would eliminate the need of looking back in the EIS.

48-1

We realize that this appendix material and parts of the Environmental Impact Statement are very technical, but this was necessary to satisfy some of the regulation requirements. We will try to make the final more readable, but there will, no doubt, still be sections that will be very difficult reading.

48-2

The Environmental Impact Statement Summary and the Environmental Impact Statement both contain descriptions of the Alternatives. Rather than adding loose sheets, we would suggest that you take these description pages out of one of the documents and use it as the "loose leaf" summary that you need to keep track of the alternatives.

48-3

The requirement to which you refer is directly out of the National Forest Management Act implementing regulations [36CFR 219.10(a)]. As a result, we must comply with this requirement. If conditions change as you suggest, the Plan could be amended to incorporate the changing conditions.

48-4

The Navaho Indian tribe near Magdalena has been added in the final Environmental Impact Statement. The "located adjacent to or within proximity" wording has been changed to "located within reasonably close proximity".

48-5

WAUM's were not added to this table because they are only one of the habitat components tracked. The wildlife recreation use included in the table is a result of changes in all of the habitat components.

48-6

The original Proposed Action Alternative would have resulted in the saw-timber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This would have resulted in entering approximately 98 percent of the tentatively suitable timber on the Forest by the end of the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data. Please refer to the "Summary of Changes" at the beginning of this document for specific details concerning the revised timber program.

We feel that these changes will result in balanced use of the Forest's resources.

48-7

MRVDs are used because there is a more direct link between recreation use of wildlife and wildlife numbers than between amount of habitat and wildlife numbers. In several alternatives, the acreage of coniferous habitats decline but, because of increased distribution of habitats, wildlife numbers are actually expected to increase. As mentioned earlier in this response WAUMs are also only one of the habitat components and we feel that by themselves they do not indicate a complete picture.

Even though we feel that MRVDs provide a more complete picture, we do feel that we provided appropriate habitat information. For example, on the alternative to which you refer, it stated that "Herbaceous forage and cover habitat are expected to increase 88 percent ... Coniferous habitats may decrease by 10 percent, however, the distribution is expected to improve".

Herbaceous forage and cover habitats are the WAUMs, so even though the exact number is not reported in this summary, the expected change in habitats is reported.

I have a few specific comments on the EIS.
 Page 2 - second sentence of second paragraph states that all future permits, contracts etc "must be consistent with this Plan." In my opinion this is too restrictive and does not allow for as much leeway, because of changing conditions, as it should.
 Page 3, 1st sentence of 1st paragraph. It bothers you failed to list the tribe near Magdalena, I also question whether any of the reservations are in "proximity" to the forest. I believe you should find a more descriptive word.
 Page 8 In Table 1, under Fish and Wildlife why aren't WAUM's and acres shown as units of measure? Such units are shown for most every other item.
 Page 13 1st paragraph under Benefits and Costs. While no dollar figures are shown here it does give me a place to point out that I think all the way through these documents timber values are too high. I have no concrete data to back this up and I have a feeling that these exaggerated timber values are placed on the Forest by the Administration and the U.S.D.
 Page 28. Wildlife and Fish. Why are MRVD's used here instead of WAUM's as used in the Plan? I think the WAUM's is a more accurate unit of measure for wildlife use on the resource.

Page 35, Alternative A. I question the accuracy of the 4th sentence. This alternative is supposedly current action. While past fire suppression did contribute to reduced habitat diversity, it did so for all alternatives not just A. You are now using prescribed natural fires in the Wilderness and have recently been authorized the use of prescribed burning. Consequently present action is doing more than this par. indicates.

Page 37 I sense (7). I do not think that the issue of Wilderness classification should be determined by alternatives. Such issue should be determined on the merits of the two areas. In my opinion neither area should be given wilderness classification but I do not feel that it is proper to influence an alternative selection based solely on an individual's preference on this issue. This same comment applies to the paragraph preceding Table 6 on page 46, and the Wilderness Study and Wild and Scenic Rivers on page 56.

Page 52. First par. under nonpriced benefits. I question that grazing capacity is one of the items for which nonmonetary value can be determined.

Page 55. Alternative B, seventh sentence, you state "Recreation costs were increased to reflect realistic costs necessary to meet the objectives of the alternative." Does this mean that costs in other alternatives are not realistic?

48-8

In order to define current management direction, we had to pick a point in time, define the current management direction at that point, and then continue to use those management practices as the definition of "current management direction". The point in time chosen was 1980 (near the beginning of our planning efforts). Changing this definition of "current management direction" each time a change in management occurred, would have required an unacceptable amount of time updating data and we would have never completed the planning tasks. As a result, Alternative A does not accurately reflect all activities that are currently being conducted.

48-9

We feel that wilderness consideration for areas of the Forest are not as clearly defined as you indicate. In addition to area suitability, we also need to evaluate tradeoffs of wilderness versus non-wilderness allocation. In order to accomplish the tradeoff analysis, the areas must be recommended for non-wilderness in some alternatives and wilderness in others. The same thing is true for Wild and Scenic River recommendations.

48-10

We agree. Grazing capacity has been taken out of the discussion.

48-11

The word "realistic" should not have been included and has been removed.

Page 63. Employment and Income. The average per capita income figures shown here appear to be extremely low. Are you sure they are correct?

Page 74. Third full par. You state "Lower wilderness management intensity will result in

fewer contacts with visitors in the field --" I don't think this is bad. Most wilderness visitors want to get away from "officialdom contacts."

Page 117. Table 65. I have some difficulty reconciling this table with the Future Trends item on page 87 (and elsewhere & table).

Page 87 shows a decrease in system roads of 40%. But Table 11 (page 117) shows 1451 miles of new roads. I don't think you have explained the road situation clearly enough. If there is to be an ^{actual} decrease of almost 500 miles in system roads that is a plus but I'm not sure I read this all correctly and probably we will experience the same difficulty.

I guess that I would have to give a general criticism to your EIS, and plan, that they seem to be too much timber oriented. Like my previous comments on timber values. I think that standards and procedures have been developed, for the service, that do not fit climatic conditions found in most forests of the southwest.

48-12

We have checked the figures and they appear to be correct. You need to note that these figures are per capita which means that they include the total population of the counties. Thus in 1977, an average four person family would have had an income of \$19,340.

48-13

We agree. This part of the Environmental Impact Statement has been changed to read "will result in reduced visitor information services and ...".

48-14

We were unable to find the 488 miles of roads that you reference as being on page 87 of the Draft Environmental Impact Statement. We assume that you mean the 872 miles of construction listed in the third paragraph. Page 87 that you reference is in Chapter 3. Chapter 3 is the "Affected Environment" chapter and explains what the future trend of continuing current management direction would be. This number would correspond to the construction shown in the Current Direction Alternative (Alternative A). If you examine Table 65 on page 117 of the draft Environmental Impact Statement, you will see that the 872 miles of construction shown in Chapter 3 is listed under Alternative A.

We realize that this is confusing and we will try to improve it in the final documents. We will also indicate the number of roads that will be closed and the number that will remain open in the Final Environmental Impact Statement.

48-15

As stated in response to your comment number 6, we have reduced the timber allowable sale quantity in the Plan. Our answer to your concern number 6 provides more information on this change.

I have no quarrel with your proposed system of management but I do disagree with regeneration direction. The requirements for artificial reforestation when natural regeneration is not effective within five years following harvest is, not logical. Very seldom will successive "good years" for seed production, and seedling establishment occur within a five year period. But with the extremely slow growth rate, on the site, the difference in final production between 5 and 15, or 20, years in establishment will scarcely be noticed, particularly when the success rate of artificial reforestation has been so low.

Another point, in your proposed timber activities, with which I disagree is the cable logging. I am not adamantly opposed to such type of harvest but I think it extremely unwise to include the area, and volume, of cable logging in your timber base. Hold it as an "ace in the hole" and when prices are right give it a good trial. If you find that you can do it successfully, with no damage to the resource, then you can carry it out as long as it is economically feasible. But don't get stuck with an acreage and volume figure which you may not be able to live.

48-16

The National Forest Management Act states that in order for an area to be considered suitable for timber production, we have to be able to reasonably assure that the area can be regenerated within five years after final removal. We have evaluated the stands on the Forest that were defined as being tentatively suitable and feel that we can meet this requirement on these stands. In a high percentage of these stands, we will be able to meet the requirement with natural regeneration but some artificial regeneration will be needed. We have had progressively better success with artificial regeneration as our planting techniques improve.

48-17

As a result of the National Forest Management Act, we are not able to hold cable volume as an "ace in the hole" as you suggest. Commercial timber harvest activities can only be conducted on areas of the Forest defined as "suitable timber". The allowable sale quantity for the Forest is defined as that volume that can be taken from these suitable timber areas using the practices defined by the Plan. As a result, steep slope timber volumes can only be removed if the areas are defined as suitable in the Plan.

We feel that the cable volume proposed in the modified Proposed Action Alternative is reasonable and that we can harvest that volume and still protect the forest environment. A more complete discussion of our rationale for including 5MMBF of cable volume is included in our response to your comment number 6.

Within the P. I. Act. I.D.
be the best. However I recommend that
it be modified to reduce some of the
timber activities, particularly cable logging
and add some more Riparian Manage-
ment and Wildlife management activities
to compensate. This would then result
in somewhat of a combination of PA
and alternative F which I think would
provide for better management of the
Gila N.F. in the future.

I have some specific comments that I want to make on your proposed Plan. Some of them may help to indicate changes that I think should be made to conform with the previous par.

We have made several changes in the Proposed Plan and feel that many of these respond to many of your concerns. As stated before, the primary timber changes are explained in our response to your comment number 6. We have also made some changes to clarify the riparian management situation on the Forest.

Where possible, road construction will be avoided in riparian areas.

Grazing in riparian zones will be managed toward providing for maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline stating that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These standards and guidelines give some specific long term goals concerning riparian condition.

Page 29. Last par under Planting 288.

One of the riparian species, *Artemisia tridentata*, seems to reproduce more from root sprouting rather than seeding. (They produce an abundance of seeds.) I suggest you include some root sprouting stimulation practices here.

Page 43. Last par - 803. This is a little sore spot with me. Why are such activities prohibited here when they are permitted in other wilderness - e.g. The La Luz Trail Run in the Sandia Wilderness.

Page 44. Second par under 803. Does this permit removal by helicopter? I think this should be clarified.

Page 48, 801. If grazing of developed recreation sites is to be permitted I think you should elaborate to show when under what conditions to heavy use periods, for example.

Page 49. Top of page. I disagree with your proposal to revoke the mineral withdrawals on 3 Emory Pass, 8 Willow Creek, 9 Gilite, 10 Bon Lilly, 12 Cherry Creek and 14 Little Walnut. Each of these are very popular, heavily used recreation sites and most of them are in areas that might warrant mineral activity if not withdrawn. I suggest you take another look at these.

Page 49. Next to last par. Why allow for cutting in this area you plan to burn 100 acres

48-19

The standard and guideline to which you refer has been changed. The word "planting" has been replaced with "regeneration" so various methods can be used to regenerate the riparian stands.

48-20

The activities to which you refer in other wilderness areas, existed before those areas were classified as wilderness. Many of these Forests are facing these activities out over time. We continue to feel that organized recreation events in the classified wilderness areas are not appropriate.

48-21

We agree that this statement needs clarification. The following statement has been added to the standard and guideline.

Helicopters can be used if determined to be the best method.

48-22

We agree that cattle use of campgrounds must be controlled. The standard and guideline to which you refer in the Developed Recreation Management Area has been changed to read "permittee cattle grazing in campgrounds only during low use periods and when improvements will not be damaged".

48-23

The mineral withdrawals in campgrounds were established before Forest Service regulations intended to control surface disturbance were promulgated. As a result of these regulations, mineral operations that will result in surface disturbance must be preceded by an approved operating plan. Operating plans provide for protection of surface resources to the extent possible under the regulations. Because of these controls and the fact that all areas recommended for revocation of withdrawals have very low potential for mineral activity, we feel that there is no need to maintain the withdrawals.

48-24

Fuelwood harvest, due to the remoteness of the area and being primarily wilderness, is very limited. Due to the low demand for fuelwood in this area and the relative small size of the juniper it would be more efficient to only harvest project generated fuelwood during this first ten year period. Project generated fuelwood can be both juniper and pine.

Page 50. Last part under C02. I am not sure what you mean to do here and what does it mean - old growth, cover habitat, squirrel habitat, turkey habitat - all in unsuitable area. Perhaps you should explain further. Also on page 64 and elsewhere.

Page 51. C04, C07 last part. Aren't all of these habitat improvements in the wilderness? Can you do them in wilderness? Also floods seem to wipe out most such structures in restricted rivers such as this portion of the Gila. I don't think you can hold them.

Page 52. Top of page. Similar comments. Aren't most of them in the wilderness?

Page 52. Bottom of page. Why limit fuelwood to project generated fuelwood at least in P-1. Topography will limit access so cutting should not be extensive.

Page 53. Bottom of page. 2. NFRS Fuel W. L. & Don't think you have to print it here.

Page 54. P04 - I don't think you have the amounts of grassland to warrant the grassland food intensity level consideration shown. What grasslands occurring here are really parts of the P-1 type.

Page 57. Top of page. Has the Continental Divide National School Trail corridor been established? Also page 64, 80 and others.

Page 65. Middle of page C05, C08. What threatened and endangered species? You do not list any in C03 + C08.

Page 66. Replacement under D05. Are Forest Boundary fences included in Allotment Boundary fences? Believe you should specify - also P70.

48-25

The reason none of the habitat component acres show up in suitable timber is because there is no suitable timber. The acres shown for unsuitable timber are the acres that exist now. We plan to maintain these acres over time.

48-26

You are correct. We cannot construct wildlife improvements within the wilderness. We have corrected this in the final Plan.

48-27

The improvements that would be in wilderness have been eliminated.

48-28

Refer to comment number 48-24

48-29

All of the fuel model information has been taken out of the Plan. The standard and guideline has been changed to read "Prescribed Natural Fire will be guided by the Gila Prescribed Natural Fire Plan".

48-30

There are 528 acres of plains grassland and 2,147 acres of mountain grassland within this management area. We feel that the direction is appropriate.

48-31

The exact route for the trail has not been established, but we do have a general corridor unofficially established. This standard and guideline is intended to protect the scenic values in that corridor. The corridor is shown on the transportation map.

48-32

There are no known T & E species in this management area. The Standard and Guideline that you referenced has been deleted.

48-33

Forest boundary fence mileage is included with allotment boundary fence mileage. To clarify the replacement priority, a Forestwide Standard has been added that states, "When replacing allotment boundary fences, Forest boundary fences will be given priority".

Page 67 Management Plan. I believe that
the increase in WAVM's is shown in the plan, but
think you can do it.

Page 68 Under wildlife you say that T +
E species will receive... and on page 69
under C05 + C08 you say that T + E species
habitat developments are protected --- ". What
T + E species? You list none.

Page 72 Third par under management
emphasis, you show a habitat capability
increase, in five decades, from 1180 WAVM's
to 1200 WAVM's. That's only 20 WAVM's. I
don't think you can measure that close and
it sure isn't much increase for 5 decades
of effort. Did you make a mistake?

Page 76 003 Twenty acres, and 15 acres,
respectively for P1 treatment, and
second period, are hardly worth the
effort. You won't get much range improve-

ment from this small amount of treatment.
Is this an error?

Page 77. I do in the plan. I do in the plan.
Your statement to "Plan to prepare 14 acres
of P1 fuelwood annually, which to exceed 14
acres in the first period" does not agree with
the 126 acres shown in the plan on page 73.
One point four acres per year is a very
small amount. I suggest that you look
at this again.

48-34

The percent increase in this area was shown as approximately 87 percent in the draft Plan. This percent increase has been reduced in the final Plan. We feel that the adjusted amount shown in the final Plan is attainable.

48-35

There are no known T & E species in the area. The standard and guidelines that you reference have been deleted.

48-36

The emphasis descriptions have all been rewritten. These small differences are no longer included.

48-37

We agree that the numbers look unrealistically low. The intent with showing this small acreage was to indicate that this is a high priority area for this type of work but funding is very limited. As a result to your comment, we have reconsidered nonstructural range improvement standard and guidelines and have added another standard and guideline to indicate the total non-structural range work that could be done if funding becomes available from other sources.

48-38

Because of changes in the Plan, many of the fuelwood harvest acreages have been changed. There appears to be an error in this management area. It has been fixed in the final.

Page 79. Fourth paragraph under management emphasis. Another increase of only 20 WAVM's. Again I doubt that such a small increase can be ^{good} assessed. This area has a potential for wildlife production and I believe you can do better than 20 WAVM's. If not, just say you will maintain current level.

Page 81. C04, C07. Don Animas Creek include "Silo and Holden Prong" If not you should probably list them.

Page 81. C05, C08. This is a different way of identifying T&E species and the first time used. Why here? Should you be restricted in all management areas?

Page 85. Management emphasis. This increase in wildlife habitat capacity of 7 WAVM's is approaching the ludicrous. See my previous comment.

On the same page, and still under management emphasis. The second quality objectives and ROS figures do not appear quite logical to me. I would have thought that not partial area's modification was and the same in the roaded natural my memory is wrong.

Page 90. It may not be the correct one to comment but since it is the last one, management area 20 I will comment here. I found no mention of or direction for the Comilla Park Watershed Area. I know from first hand observation that this area has responded to the best management given it and I should hate to see it go down to zero because of no direction. I strongly urge you to include something about this treated area in your plan.

48-39

The management emphasis statements have been rewritten. These small increases have been eliminated.

48-40

It does. Animas Creek has been changed to Animas Creek Drainage.

48-41

This was done intentionally to avoid naming specific species in this areas.

48-42

Same response as for comment number 39.

48-43

We agree that there is an error in the acreage figures. We have reviewed all of the ROS acres and have included the corrected acreage in the final Plan.

48-44

We have added a standard and guideline to maintain the watershed structures.

Page 98. Bottom of page. "You show opening maintenance levels of only one acre for each period - one acre in ten years! This is hardly worth the effort of putting it on the map. The wildlife biologist should be able to maintain one acre of openings during his lunch break! I suggest that you look at this again and if the computer insists on one acre drop it. It makes your other figures questionable. Essentially the same comment applies to page 109 where you show 1 acre of clearcut (wildlife openings MC).

Page 119 112, 113. The miles of local roads to be constructed appears to be high. I suggest you drop them again.

Page 144 Management Emphasis; first para. last sentence. I question where you have the 4,165 acres of suitable timber in this management area (also on page 145). This may be one of the cable logging areas and if so I suggest you remove it from the list. If not, it tied down to 278 MCF per year sustained yield. I suspect that this timber area is

just a Burson road and could create an exposure, as well as irretrievable soil loss, in this scenic area. I suggest you drop it.

48-45

We agree that it is not appropriate to show such small acreages. They have been removed.

48-46

The road mileage has been adjusted to reflect the mileage needed to access timber in the modified Plan. We have also added information on the approximate number of roads that would be closed after timber activities are completed.

48-47

The tentatively suitable timber acres for this Management Area are correct. As a result of changes in the Proposed Action Alternative, however, there are no timber sales planned in this area in the first decade.

Page 146. C03, C06. This management area probably has as many grouse as any on the Bitter. Since grouse are very scarce on the Bitter, I suggest that you emphasize them in this area. I failed to pick this up earlier but grouse should also be emphasized in area 4 & (page 123).

Page 147. C11. What's the difference, really, between "man-made barriers" and "natural appearing man-made barriers." Shouldn't an effort be made to make them all as near natural appearing as possible? I don't think you busy much with the two classifications. (Also page 190 and others)

Page 148. Lands 512. I commend you for including the general and legal description of the private lands to be acquired. I recommend that you do this in all management areas. It helps to zero in on what you are trying to do. Somewhat the same comment applies to L21, L22 trail reconstruction. Very good!

Page 176. C07, C10, C11. Habitat maintenance of only one, special improvement, structure per decade doesn't sound like much. If you defined what they were it might not sound as insignificant.

Page 178. C13, C14. Ninety one miles of road reconstruction, reconstruction, appears quite large to harvest 4562 acres of timber. Is it worth it? Take another look.

48-48

We agree that grouse should be included in the game species emphasized for 4A and 4D. They have been added to the standard and guideline that you referenced.

48-49

We agree. We have combined the two and called them "Man-made barriers".

48-50

We agree that from a public understanding standpoint, this would have been a good approach to use throughout the document, but it is not possible to make the change at this point in the process. Many of the areas are not easily described and the development of descriptions would be very time consuming. These areas are mapped and the maps will be used by the district personnel. We do not feel that the descriptions would significantly add in implementation of the Plan.

48-51

This information was included to give a general description of the type of activities that could take place in the area and as a method of costing out the different intensities of management. It is not possible to define the exact type of structure that would be developed at the Forest Plan level of analysis. The type of structure needed will be determined when project implementation plans are developed.

48-52

We have re-evaluated the road mileage needs for the reduced timber program in the Proposed Action Alternative. The correct mileage needs are included in the Final Plan. We have also included the approximate mileage of the roads that will be closed after timber activities are completed.

Page 214. Facilities L01. The Continental Divide doesn't really go on this area (is right on the boundary) and I'm sure that trail No 74 does not. I think your comment top of page 211 probably takes care of any needs for mentioning it. Also on page 218 L01 there is no trail ^{here} in this management area. I suggest striking out the words "on its general alignment of trail #74".

Page 250 ^{in AM} E00, E06, E07. - I don't think you can accomplish the two items listed here in this management area. It can't be done! I suggest you drop them.

Page 251. Facilities. Where are the 12.5 miles of road in this area? and where are the six miles of road to be maintained at level 4 annually? You must have included the state highway. Better check.

Page 255. This is probably not the place to bring it up but it just came to mind here. It finds no mention anywhere of the Gila front vicere, Plans. Don't you think it should be brought into this Forest Plan?

Page 257 Facilities L01. Here again where are the 2 miles of roads, and L19 to be maintained twice annually? Aren't there the state highway? Check again.

Page 267. C04, C07. Something seems to be missing here. you show "fish habitat" then nothing follows. Then you show "average" activity, per decade. followed by a listing. Look at this again. It doesn't make sense.

48-53

We agree. The reference to the Continental Divide Trail has been taken out of Management Area 7A. The reference to Trail #74 has been deleted from the Continental Divide Trail Standard and Guideline in Management Area 7B.

48-54

We agree that these standards are not correct as written. The first one has been rewritten to read "Prepare, offer, and administer a maximum of 9MBF of personal use deed...". The portion of the standard that dealt with green fuelwood has been eliminated.

48-55

The information you mention was in error. We have corrected it in the final Plan.

48-56

Even though the Gila Trout Recovery Plan is not specifically mentioned, implementation of the specifics in the recovery plan are assured by standards and guidelines in the Forest Plan. For example, the Management Area 40 direction contains the following standard and guideline.

Continue threatened and endangered species habitat improvements as identified through approved recovery plans. Objectives are to maintain T&E habitats and address recovery needs on a case-by-case basis.

Since the recovery plan contains, in detail, the specific actions necessary to recover individual species, we do not think these specifics require repeating in the Forest Plan.

48-57

The two miles of road are correct; Forest Service maintenance responsibility starts at the bridge and includes the roads to the barn and the campground.

48-58

Since there were no first decade improvements, the standard and guideline has been removed.

Page 273. C 89, C 10, C 11. Again, what T & E species?

Page 293. Air. 5 Frequency. Does this mean every day for 10 years? I have a bunch of pictures. Can you do it?

Page 304 Cover Habitat. Can't there be P2, or even Chapparel, Cover Habitat?

Page 311 Why two definitions for Management Concern?

Page 313 - Nonstructural Range Improvement. Why use sagebrush as an example on the table where there is no sagebrush? Surely you can do better than this.

I think that a tabulation, similar to your step 8 summary, would help to see the effects of the changes in your summary. I obtained one from Mr. Engel & found it useful. I am enclosing it with my comments for information while it might be too late. I think the district summary that I added is somewhat revealing and indicates a possible broad trend.

I would also like to see a road summary, by management area and districts, included. It would be of big help, particularly if it showed miles of new road and miles of existing roads closed. It's a little difficult to pick out from the text just how many miles of new road is being added, or if total miles are dropping.

48-59

There are no known T & E species. The reference to T & E has been removed.

48-60

This means 3 times per day for 10 years. The period could be shorter if it is determined that the data collected is adequate for base line information and it appears as if air quality will not change for some period after monitoring is terminated.

48-61

The cover type defined in the glossary is the definition of the cover acres tracked in the plan. There can be PJ cover, etc., but these were not tracked.

48-62

We agree that there is no need for two definitions for management concerns. The second one has been deleted in the final planning documents.

48-63

We agree that a better example could be provided. We have included a PJ example rather than the sage brush example.

48-64

We agree a display of livestock and wildlife use can be helpful if it is fully understood. Our concern is that without knowing the interrelationships between the species and the lands potential to produce on each area, the room for misunderstanding is great. For this reason, a graphic display of WAUM and AUM's is not presented in the final.

The district summary you suggested as being attached to your comments was not found; however, in various discussions with you it was explained that the level of livestock management and the opportunity for future development is different on each Ranger District. The same situation exist for wildlife, but is compounded by a greater number of species. Wildlife habitat in some areas is very limiting, while other areas a good opportunity exists for improved habitat. Each management area was evaluated for both its livestock and wildlife potential and the cost to develop each one. If a pattern of bias developed, it was related to the land's capability to produce.

48-65

We agree that this would be helpful. We have added road construction and reconstruction and road closure information to the tables at the beginning of the management direction section of the Plan.

Again I would have to go along with the planned action with some modification. I'd like timber and add in Riparian habitat and wildlife. Also take a good look at roads. You may be getting in many.

Thanks for the opportunity of commenting. With personal regards.

Sincerely

Richard L. Johnson

48-86

Thank you for your comments. We have made many of the changes to the Proposed Action Alternative that you and others have suggested. A summary of these changes is included at the beginning of this public comment document.

LETTER 49

FOREST SERVICE RESPONSE TO LETTER 49

Dear Supervisor -

10.4.85

We urge you to use your influence to push for wilderness designation in the roadless areas of the Gila National Forest, inc:

Lower San Francisco Canyon

Hell's Hole

Areas along the Mogollon Rim

Fire's Peak & Eagle Peak

Areas adjacent to Aldo Leopold Wildl

000 49

Sydney Walter

Martina Walter

49-1

Wilderness recommendation for the two wilderness study areas that you mentioned was reconsidered. However, a nonwilderness recommendation was retained. Please refer to the Wilderness Study Area section of the "Summary of Changes" located at the beginning of this document for detailed information concerning this recommendation.

49-2

You also indicated a concern relating to management of several unroaded areas on the Forest. While none of these areas are recommended for wilderness in this cycle of planning, 87 percent of the existing 699,000 unroaded acres on the Forest will be managed to maintain semi-primitive recreation opportunities. Again, refer to the "Summary of Changes" at the beginning of this document for more discussion concerning the undeveloped areas on the Forest.

10/3/85
I oppose increased timber harvest-
ing & road building in the Gila
for the following reasons:

1. It is costly to me, the taxpayer.
2. It damages other multiple use
(e.g., erosion ruins water supply &
fish habitat).
3. The preferred alternative: elimi-
nate future wilderness designa-
tions. I want to increase "wilder-
ness" acreage as a savings ac-
count for my daughter & her
children.

I support wilderness designation for
Lower San Francisco Canyon (for its
diversity in species) & Hells Hole (for
recreation). I support keeping Mo-
gollon Rim, Frisco Box, & areas near
Albuquerque as wilderness for habitat
& watershed protection.

Thank you.

Kathy Glaz

000 50

50-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 40 MMBF by the fifth decade. The modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57 per- cent reduction in the amount of roads to be constructed and results in less development of the existing unroaded areas on the Forest.

50-2

The proposed Gila Plan did not recommend any additional acreage for inclusion in the wilderness system at this time; however, only three percent of the unroaded areas would be developed in the first 10 years. The areas that remain unroaded will be reconsidered for wilderness when the Plan is revised in 10 to 15 years. Please see the Proposed Action Alternative Summary of Change located at the beginning of the public comment document for a more complete description of the changes made between the draft and final Plan.

50-3

We have reevaluated our recommendation on the two Wilderness Study Areas, but we still feel that a nonwilderness recommendation is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

000 51

Dear Sir:

I would like to comment on the Draft EIS for the Gila National Forest.

First, the Proposed Alternative places high emphasis on commodity production. This is in contradiction with Table 15 which shows Alternative F ranked first in both PNB and B/C ratios. This situation may be explained by Table 16 which records dollar revenue to the U.S. Treasury. Unfortunately, this measure of present cash value is not the criterion by which the Gila Forest should be managed for the next fifty years. This approach is a short term view. Amenity resources increase in value over time while the value of extractive resources decreases. Extensive industry outputs are typically intermediate goods and services for which substitutes exist. Environmental resources can not be produced by man and over time become more valuable due to increasing demand for a scarce resource.

Second, the Proposed Alternative may lead to increased soil erosion and the destruction of roadless areas due to increases in timber harvesting. The EIS report is difficult to interpret with regards to these associated environmental costs. If these costs are excluded from computer simulations then PNB calculations will be too favorable for commodity production estimates.

Third, Mallett Hole and the Lower San Francisco Canyon areas should be considered for wilderness designation. In a similar trend, that segment of the Gila River should be classified in the wild category. This section of river contains the

- 1 -

51-1

Alternative F, as stated, has the highest PMV, benefits, and B/C ratio; however this alternative fails to address the issues of producing wood, fiber, managing and utilizing range resources, and improving range grazing, which are also legitimate Forest uses. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits (please refer to the "Summary of Changes" at the beginning of this document for a detailed description of changes made to the Proposed Action Alternative). We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

51-2

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35MMBF per year in the first decade. The volume was projected to increase to approximately 48MMBF by the fifth decade. This increase was a result of the timber benefit values used in the decade. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative proposes an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

This decrease in projected timber activity resulted in a 43 percent reduction in the soil loss from timber activities. The reduced timber allowable sale quantity and changes made as a result of public concerns has resulted in less development of the existing unroaded areas of the Forest. Again, please refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the future of the unroaded areas on the Forest.

51-3

We have reevaluated our decision concerning the two Wilderness Study Areas on the Forest and feel that the nonwilderness recommendation is the appropriate recommendation. The Summary of Changes at the beginning of this document provides a detailed discussion of this recommendation.

51-4

The eligible portions of the San Francisco and Gila Rivers, as detailed in Table 35 and 36 of the draft Environmental Impact Statement were evaluated to determine whether or not they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic Rivers Act as amended thereto. The Summary of Changes section of this document provides the rationale for the recommendation made concerning this issue.

LETTER 52

FOREST SERVICE RESPONSE TO LETTER 52

52-1

Alternative F has the highest PNW, priced benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing, which are legitimate uses of the Forest as well. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the beginning of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F, and does actually operate in the best interest of the most people.

52-2

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are difficult to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management Program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas is designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

It is true that timber activities will result in additional soil loss. This soil loss, however, will be minimized through the use of Best Management Practices (practices designed to minimize the effects of nonpoint pollution in this case sediment, sources.) This will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long term productivity. Since sediment from timber areas will be controlled and the overall soil loss from the Forest will be reduced over time, water quality should generally not decrease.

The modified Proposed Action Alternative actually results in an improvement of wildlife outputs over time. Many of the game species are benefited by the type of management practices conducted within timber sale areas. Through integrated stand management, diversity of age classes will be increased, which is a benefit to many types of wildlife.

000 52

U.S. Forest Service
Washington, D.C. 20250
October 7, 1985

Dear Sir,

Why is our timber harvest in early December? Why is our timber harvest not selective? Is not the government supposed to protect the best interests of the forest? Is not a selective harvest better?

I and all the members of the Sierra Club oppose the selective harvest.

Further harvests of our timber are not only dangerous, but in some cases are cost effective and dangerous for other reasons. The members of the Sierra Club oppose the selective harvest.

Please don't let our beautiful Southwest and the nation come to harm.

LETTER 52

FOREST SERVICE RESPONSE TO LETTER 52

I do have no ill will against wilderness designation for the land on which the monument is located. I am only concerned that the monument be properly managed. In addition, to have the monument be a national monument, as the monument is, is areas adjacent to the Aldo Leopold wilderness as non-wilderness and undeveloped would be of great benefit to the future.

Please don't sell out the land.

Sincerely,

H. H. H. H. H.

52-3

We have reevaluated our recommendation on the two Wilderness Study Areas, and it is our feeling that a nonwilderness recommendation is appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

52-4

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain semi-primitive recreation opportunities. As a result, only three percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Again, refer to the Proposed Action Changes Summary at the beginning of this document for information concerning the recommendation for each unroaded area on the Forest.

Plant. Fx, NM 87501

O. date 6, 1985

Forest Supervisor

000 53

I am writing to express my opposition
to increased timber harvest and road
construction.

I support wilderness nomination for
the Lower San Francisco Canyon and
Hells Hole

In addition I advocate roadless, non-
motorized recreation for

- areas along the Gila National River
- the Frisco Box & Eagle Peak
- area adjacent to Aldo Leopold Wilderness

GILA NATIONAL FOREST
SILVER PINE DISTRICT

OCT 08/85

Thank you,

Don Dwyer

53-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount increased to 48 MMBF over time. The revised Plan projects timber harvest at 30 MMBF per year during the first decade, to remain at that level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The draft Plan proposed the construction of 1450 miles of roads during the first 50 years. The revised Plan identifies a need for approximately 630 miles of road construction in the same time period. Approximately 65 percent of these roads will be closed when timber activities are completed. Please refer to the Proposed Action Changes Summary at the beginning of this document for a detailed discussion of the revised Gila National Forest timber program.

53-2

We have re-evaluated our recommendation on the two Wilderness Study Areas, and continue to support the non-wilderness recommendation. Again, refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

53-3

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain semi-primitive recreation opportunities. This means that only three percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Of the areas specifically mentioned, the following acres would be affected by development activities during the first decade.

UNDEVELOPED AREA	EXISTING AC.	AC. AFFECTED	APP. % OF
Adj. to Gila Wilderness	73,515	1,050	1%
Adj. to Aldo Leopold Wilder.	98,055	0	0%
Devils Creek	89,585	2,500	3%
Nolan	11,830	0	0%
Aspen Mountain	19,510	1,907	9%
Mother Hubbard	6,090	0	0%
Frisco Box	40,050	1,950	5%
Sawyers Peak	84,200	0	0%
Eagle Peak	27,180	7,105	23%
Taylor Creek	6,130	0	0%

54-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade. This amount increased to 48 MMBF over time. The revised Plan projects timber harvest at 30 MMBF per year during the first decade, to remain at that level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The draft Plan proposed the construction of 1450 miles of roads during the first 50 years. The revised Plan identifies a need for approximately 630 miles of road construction in the same time period. Approximately 65 percent of these roads will be closed when timber activities are completed. Please refer to the Proposed Action Change Summary at the beginning of this document for a detailed discussion of the revised Gila National Forest timber program.

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are difficult to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas is designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

54-2

We have re-evaluated our recommendation on the two Wilderness Study Areas, and continue to support the non-wilderness recommendation. Again, refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

54-3

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be effected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain semi-primitive recreation opportunities. This means that only three percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Of the areas specifically mentioned,

247

David B. Clawson

000 54

2207 Camino de Los Artesanos NW

Albuquerque, New Mexico 87107

October 4, 1985

Forest Supervisor

Gila National Forest

2610 North Silver Street

Silver City, New Mexico 88061

GILA NATIONAL FOREST
Silver City New Mexico

OCT 08 '85

DATE RECORDED

Dear Sir:

I have read your draft management plan for the Gila National Forest, including your preferred alternative.

I oppose the proposed increases in timber harvest and road construction, because they would be uneconomic, damaging to other forest uses and values, and destructive of remaining wildlands.

I support wilderness designation for Lower San Francisco Canyon and Wells Hole. In addition, the following areas should be managed as roadless and undeveloped for semi-primitive, non-motorized recreation, in order to retain their value for ecological study, recreation, wildlife and watershed protection.

(1) areas along the Mogollon River, stretching from the Blue Range to the Gila Wilderness (125,855 acres)

LETTER 54

(2) free standing wilderness candidate areas, such as Frisco Box (40,050 acres) and Eagle Peak (30,380 acres) and, (3) areas adjacent to Aldo Leopold Wilderness (170,160 acres).

Sincerely yours,
David L. Clawson

FOREST SERVICE RESPONSE TO LETTER 54

the following acres would be affected by development activities during the first decade.

UNDEVELOPED AREA	EXISTING AC.	AC. AFFECTED	APP. % OF
AREA			
Adj. to Gila Wilderness	73,515	1,050	1%
Adj. to Aldo Leopold Wilder.	98,055	0	0%
Devils Creek	89,595	2,500	3%
Nolan	11,530	0	0%
Aspen Mountain	19,510	1,907	9%
Mother Hubbard	6,090	0	0%
Frisco Box	40,050	1,950	5%
Sawyers Peak	64,200	0	0%
Eagle Peak	27,180	7,105	23%
Taylor Creek	6,130	0	0%

LETTER 55

000 55

Joanne Hardisty
1004 Still Drive
Las Cruces, NM 88001

October 2 1985

Mr. Kenneth I. Scroggin, forest supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scroggin:

After reviewing the proposed management plan for the Gila National Forest I strongly urge that the proposed action alternative would be an environmentally damaging undertaking. This alternative would result in a large increase in the modification and destruction of many areas of the forest. It does NOT provide for the proper protection and maintenance of the forest as a whole. The proposed action alternative would increase the amount of timbering in the Gila by an extremely unreasonable amount. By the Forest Service's own admission, the Gila National Forest is losing money on timber sales. Therefore it is impossible to justify an increase in timber harvest. Your projections for future need are unreasonable. The resulting increase in construction of roads in current roadless areas is unjustifiable. It is obvious that more roads will result in easier access for more people into areas that are currently prime wildlife habitat. Many people visit the Gila National Forest to enjoy the undisturbed, natural environment, NOT to view more treeless areas and pavement.

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 08 '85

DATE RECEIVED

FOREST SERVICE RESPONSE TO LETTER 55

55-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 48 MMBF by the fifth decade. This would have resulted in entering approximately 98 percent of the tentatively suitable timber on the Forest by the end of the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data. Over the last 10 to 15 years, the Gila National Forest has sold an average of about 30 MMBF of sawtimber per year.

The timber allowable sale quantity has been reduced in the modified Proposed Action Alternative. In order to respond to the Forest issues, the sawtimber volume of 30 MMBF is projected for the first decade (this is approximately 15 percent below the original Proposed Action Alternative). The cubic foot equivalent of this volume would be sustained over time. Timber outputs no longer increase. Using the silvicultural prescriptions proposed in the Plan, this volume can be sustained on approximately 62 percent of the tentatively suitable timber area.

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems was also a concern expressed by a number of people. In re-evaluating the Proposed Action Alternative, it was determined that the most cost efficient method of obtaining the 30 MMBF target was to log some portion of the volume from steep slope areas. This is because steep slope areas often have relatively high volumes per acre, and logging steep slope areas in conjunction with less than 40 percent slope areas often result in construction of fewer miles of roads per thousand board feet of volume harvested. In order to respond to the concerns regarding steep slope logging, the Forest planning model was constrained to allocate the harvest of no more than 5 MMBF from steep slope areas. This resulted in steep slope harvest in the modified Proposed Action Alternative being 59 percent of that projected level in the original Proposed Action Alternative. The Forest management team feels that the use of cable systems should be pursued. In the long term, cable harvest could result in the construction of less miles of roads and less roading of presently unroaded areas than obtaining 30 MMBF from only less than 40 percent slope areas. The use of cable systems on steep slope areas could eventually result in their use on less than 40 percent slope areas, resulting in positive environmental benefits.

Along with the changes in allowable sale quantity, the projected road construction miles would also change significantly. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projected construction of approximately 830 miles of roads. This is a 57 percent reduction in projected five decade road construction. There would be a reduction of approximately 20 percent in road construction and reconstruction in the first decade. Local roads constructed as a result of timber activities and not needed for administrative purposes would be closed. This would result in closing approximately 65 percent of the roads constructed. Construction and reconstruction of fewer roads and the closure of roads when no longer needed for administrative purposes should result in significantly less soil loss from roads than that projected in the original Proposed Action Alternative. Please refer to the Proposed Action Changes Summary at the beginning of this document for more details concerning the revised timber program.

LETTER 55

FOREST SERVICE RESPONSE TO LETTER 55

This brings another point to mind. The current management plan discusses enhancement of wildlife habitat via timber harvest. No doubt many of the larger mammals do benefit from forest openings; however, it is not necessary to sell timber in order to have forest openings. A careful selection and placement of your "let burn" policy would definitely create forest openings. Until the time that this policy can be fully enacted, fires which are logged to create forest openings should be left in place, since fallen logs provide ideal habitat for many animal species. Furthermore, recent study indicates that decomposing logs may provide a much greater supply of nutrients to the forest than was previously believed. Undisturbed forest is excellent habitat for forest-dwelling animals. Table 2 on page 10 in the Forest Plan explicitly depicts the dramatic decrease in wildlife habitat which would result from your various alternatives. This is shameful and unacceptable. The Forest Service has an obligation to protect our ecosystems, not enhance their destruction.

55-2

We agree that openings can be created by fire as well as through timber harvest. It needs to be noted, however, that openings are not the only habitat component managed through timber sale activities. In fact, most timber harvest prescriptions in the Plan involve shelterwood harvest and do not create openings. Clearcutting has been prescribed only where wildlife openings are one of the habitat needs for an area. Fire could be used to create some of these openings, but fire is much more difficult to control than timber sale activities and creating or maintaining the distribution of certain habitats such as old growth and cover within the areas burned would require very exacting conditions.

In the development of timber sales, the stands to be logged are evaluated using the integrated stand management process. Using this process, timber stands are evaluated in terms of existing cover conditions and wildlife species present. Various prescriptions are analyzed to see which best provides the cover and feeding habitats to meet the needs of the species present. After each stand is evaluated, the sale prescription is developed that will produce the best mosaic of feeding and cover habitats for those species. The selected prescription is then computer modeled to insure that it will continue to provide the necessary feeding-cover mosaic through time.

You also expressed a concern regarding retention of downed material. If timber were cut and left as you suggest, it would create a dangerous fire situation with potentially devastating results.

We do however agree that the retention of downed woody material on the forest floor is an important wildlife habitat consideration. The following Forestwide Guideline has been added to the Plan to further address this issue.

Provide for an average of two down logs per acre (12" diameter or larger) or untreated slash piles ten feet in diameter or a combination of down logs and slash piles over 55 percent of the forested area.

The following clarification of the guideline for fuelwood use of cull material and slash has also been added.

Once wildlife habitat and other requirements for down woody material are met, cull material and slash over three inches in diameter will be made available as fuelwood for two years after timber harvest.

55-3

We disagree with your conclusion to the data in Table 2 on page 10 of the DEIS summary. The first part of this table should not be used out of context with the remainder of the table. Even under natural conditions, the acres of habitat change over time. Distributions of habitat is just as important as the amount of acreage. Distribution is related to the direct and indirect habitat improvements (these help make habitats useable) and the coordination of wildlife needs during project planning and implementation. These factors were taken into consideration in the other portions of Table 2 on page 10. As you can see, the conclusion is that four of the seven alternatives (while resulting in decreases in habitat acres) actually result in increases in habitat diversity and carrying capacity.

It is inexcusable that the Lower San Francisco Canyon and Hell's Hole are not proposed as wilderness areas in the proposed action alternative. Hell's Hole is an excellent example of rugged

southwestern landscape and native vegetation. The Lower San Francisco Canyon is one of the most breath-taking areas that I have ever seen. Your current policy of allowing four-wheel drive vehicles into this area causes undue harassment to many species of wildlife in the area. It also detracts from the aesthetic quality of the area. I am sure that flooding often causes modification along portions of the San Francisco River. However, flooding also prepares streambank as prime seedbeds for the germination of many riparian plant species. The same cannot be said for human activities in the canyon. Therefore, I propose that both the Lower San Francisco Canyon and Hell's Hole be made wilderness areas for the enjoyment of future generations.

Furthermore, the following areas should be maintained as roadless and undeveloped for semi-primitive non-motorized recreation:

- areas along the Huxton Rim stretching from the Blue Range to the Gila Wilderness
- freestanding wilderness candidate areas, such as the Frisco Box and Eagle Feat
- areas adjacent to the Aldo Leopold Wilderness

Both the Gila River and the San Francisco River meet the qualifications for classification under the Wild and Scenic Rivers program. Natural riparian areas in the Southwest are becoming increasingly scarce as a result of continued destruction and modification by man. Both the Gila and San Francisco provide prime wildlife habitat. Riparian plant species such as *Platanus wrightii* and *Equisetum fragillile* are becoming increasingly rare due to wide scale destruction of riparian forests by man. Therefore, I propose that both the Gila River and the San Francisco River be given Wild and Scenic River status and all the protection that such a designation affords. Our riparian zones must be protected since they are vital components of natural ecosystems in the arid Southwest.

55-4

We have re-evaluated our recommendation on the two study areas and continue to support the non-wilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

55-5

We disagree that the whole San Francisco River should be closed to ORV use. The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the canyon but to all unauthorized entry, including recreational hiking. Since the closure was enacted, a study of the canyon prepared by the Museum of Northern Arizona (Riparian Ecology of the San Francisco River; Carothers, Steven W. et.al., 1982) indicated that at that time the Black Hawk was not nesting in the Main canyon. In the study summary, the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the River is sufficiently turbid and that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the ORV use of the canyon may cause erosion of the river benches. This conclusion was made by the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly affected the natural erosion rates.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year around.

55-6

Of the approximately 689,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain semi-primitive recreation opportunities. This means that only three percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Again, refer to the Proposed Action Changes Summary at the beginning of this document for a detailed discussion of the undeveloped areas as proposed by the revised Forest Plan.

55-7

The eligible portions of the San Francisco and Gila Rivers, as detailed in Table 35 and 36 of the DEIS, were re-evaluated to determine if they possessed the outstanding, remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic Rivers Act. The decision to not recommend the Rivers for inclusion is explained in the Summary of Changes located at the beginning of this document.

In particular, grazing by domestic livestock has a devastating effect on the regeneration many species of riparian vegetation. Therefore riparian zones as well as the forest as a whole should be protected from grazing by domestic livestock particularly during periods of plant germination and regeneration. In general the Forest Service has supported the cattle industry at the taxpayer's expense. Cattle in the riparian zone, and in the entire forest as well, trample and consume vegetation, cause soil erosion, and decrease the aesthetic quality of the forest.

8

55-8

Your two comments: the level of grazing in the Proposed Action, and the management of riparian areas are addressed separately.

We appreciate your concern relating to the level of livestock grazing in the Proposed Action Alternative, but we feel that the level of livestock grazing projected is an appropriate and attainable level that will result in improvement of riparian zones and in the protection of environmentally fragile areas. In the Proposed Action Alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

Your concern for the management of riparian areas is shared by many individuals that responded to the draft planning documents. We agree that riparian habitats are extremely important. To clarify our management objectives, the following standards and guidelines have been added to the Forestwide Standards and Guidelines.

Where possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted in such a manner as to provide for the protection of these key areas.

Grazing in riparian zones will be managed to provide for maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

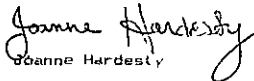
In addition, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These standards and guidelines give some specific long term goals to reach concerning riparian condition.

The changes in the Proposed Action Alternative are expected to result in an increase in riparian habitat condition over time but the increase will still not be attained as soon as if Alternative F were implemented. Due to the multiple use goals in the Proposed Action Alternative and the associated budget constraints, it is not possible to attain those accelerated levels of riparian management. Riparian condition is a major concern on the Forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

LETTER 55

It is time that the Forest Service reflects the needs of all Americans -- that is, the preservation of natural ecosystems rather than the perpetual destruction of natural areas by activities such as cattle grazing and timber sales. Therefore I urge that both timbering and livestock grazing be drastically reduced in the Gila National Forest. The Gila River and the San Francisco River should be designated as Wild and Scenic Rivers. The Lower San Francisco and Hill's Hole should be designated as wilderness areas. Present roadless areas should be maintained as such for the preservation of prime wildlife habitat. The Forest Service has an obligation to preserve our nation's remaining natural areas -- not aid in their destruction. The designation of numerous Research Natural Areas within the Gila National Forest would do much to promote research into the complex interrelationships of natural ecosystems. This would provide information as to how the forest should be managed to insure the longterm perpetuation of a healthy ecosystem.

Sincerely,


Joanne Hardesty

FOREST SERVICE RESPONSE TO LETTER 55

55-9

We feel that we have been successful in responding to many of the concerns expressed by you and others in the form of changes made to the Plan between the draft and final stages. We feel that the Proposed Action Alternative presented in the final planning documents provides for balanced use of the Forest's resources.

LETTER 56

FOREST SERVICE RESPONSE TO LETTER 56

000 56

PO Box 2991
Silver City, NM 88062
October 6, 1985

DATE RECEIVED

Ken Sooggin
Supervisor, Gila N.F.
2610 Silver
Silver City, NM 88062

RE: Gila N.F. Master Plan

Dear Mr. Sooggin:

I strongly oppose the proposed plan. The proposed plan will compromise habitat, and the losers will be wildlife and people who value recreation.

I oppose opening the Forest to more logging abuses. I personally have come close to being run off the road by a speeding log truck (Hwy 15, between milepost 21--22). Also, these heavy trucks destroy the pavement, and I hope your calculations take into account the costs of repaving caused by damage from heavy trucks.

The Gila Forest will be increasingly threatened by the tremendous population growth in the El Paso-Las Cruces area. The recreation needs will increase dramatically in the next 10-20 years. Therefore, I am puzzled by your plan which is not in the best interests of recreation. Are the Forest Service staff asleep?

In my opinion, your staff need to do more to preserve the recreational facilities, and to educate the public about litter and abuses of the forest ecology. For example, the campground facilities at Scorpion Campground/Gila Cliff Dwellings are not as well maintained as they once were (more trash, rusting bathrooms). Also, the Boliden mining operation has been an eyesore with rusting culvert pipes setting beside Hwy 15 for many months. Further, I would like you to step up your campaign to educate children in the public schools to refrain from littering. One need only walk down Bear Creek from Pinos Altos to see the mess caused by the careless tossing of pop and beer bottles, cans, etc.

Instead of giving away this precious resource to logging interests, why not work harder to keep the forest clean?

I am deeply disappointed that your staff do not seem to value the preservation of the Gila Forest. I hope this situation can be promptly corrected before irreparable harm is done to the Gila Forest.

Sincerely,
Alfred St. Louis
Alfred St. Louis

C. Reg. Supervisor Manis
Senator Jeff Bingaman

56-1

We disagree that wildlife and recreation will be the losers as a result of the Proposed Plan. As stated in the draft Environmental Impact Statement [page 99] wildlife habitat diversity and carrying capacity is actually expected to moderately improve. Recreation facilities would be maintained and the demand for dispersed recreation will be met. However, as a result of public concerns regarding the level of timber harvest and other activities, some changes have occurred in the Proposed Action Alternative. These changes are summarized in the "Summary of Changes" located at the beginning of this document.

56-2

Because of public concern relating to the level of timber harvest projected in the Proposed Action Alternative, the alternative has been modified. The original Proposed Action Alternative would have resulted in the net timber harvest of approximately 35MMBF per year in the first decade, and projected to increase to approximately 48MMBF by the fifth decade. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative proposes an allowable sale quantity of approximately 30MMBF. This allowable sale quantity is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

56-3

Maintenance of Forest roads has been included in our cost accounting system.

56-4

We can assure you that the Forest Service staff are aware of the potential increased population growth in the Southwest. This projected growth increase was used to project the increased demand for recreation on the Forest. We feel that the Forest should continue to provide the type of recreation that is not available from other sources. This includes dispersed recreation in a forest environment and developed recreation that cannot be readily provided by the private sector (sites in a forested environment and near public lakes). In the Proposed Action Alternative, one new campground is planned near Quemado Lake. Existing campgrounds that contribute to the object of providing developed recreation that cannot be readily provided by the private sector would be maintained. Dispersed recreation opportunities would be available to satisfy the demand for the foreseeable future.

We feel that these recreation goals can be met while providing for other multiple use outputs.

56-5

The portion of this comment that deals with recreational facilities is addressed in our response to your comment number 4. We will continue to do everything we can to maintain the scenic beauty of the Forest and discourage litter.

This morning there was 50 elk in my field at the Ranch and others bugling on the range outside and yet your Plan shows no elk on unit 3C. Most of them have moved in since your survey was made. I feel that the increase in wildlife has already been made.

The Enterprise allotment has been fenced & cross fenced and we have been on a rest rotation program since the early 70's we have pipe lines and many stock tanks so I fail to see why we are on a management plan of B level. When our neighboring allotments and units are on a C & D level we are all willing and able to build and maintain improvements on our own expense if grazing fees do not get so high we can't stay in business and we have the assurance of maintaining our present numbers.

Byford Huebrey

010705

010705

000 57

57-1

The management emphasis for management area 3C provides for a 60 percent increase in wildlife. The actual numbers of wildlife today may have, as you suggest, increased to 60 percent above the 1980 level identified in the Forest Plan. Through a cooperative effort with the New Mexico Game and Fish Department, the Forest Service, and the permittee, wildlife and livestock numbers as shown in the Plan can be maintained.

57-2

Management intensity as shown in the Proposed Plan assumes the level of funding that could be provided by the Forest Service, and assumes the level of permittee funding would remain about the same. Because some permittees can provide more economic support to the allotment to sustain a higher level of management than others, we have changed the wording in the standards and guidelines to read "Grazing allotments generally will be managed to range intensity level of _____ or above". This allows the potential for a higher level of management intensity; provided funding and other management emphasis levels can be maintained.

57-3

Grazing fees and the authorization to continue grazing on the National Forest are controlled by law. The ability of the land to support livestock and other resources, as well as the degree to which each of these resources are compatible, will in the end determine their survival.

LETTER 59

FOREST SERVICE RESPONSE TO LETTER 59

A Kennecott Mitsubishi Partnership
Hurley New Mexico 88043
505 537-3381

000 59

October 8, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
Silver City, NM 88061

Dear Mr. Scoggin:

Subject: Reply to 1950 concerning your May 1985 Proposed Gila National Forest Plan and Draft Environmental Impact Statement

The privilege is appreciated of submitting for your consideration the enclosed comments prior to the public notice deadline of October 9, 1985. These comments are intended to be constructive in the development of a plan which will best serve the public trust.

Yours very truly,

Thomas R. Shelley

Thomas R. Shelley
Land and Water
Resource Manager

TRS/abc
Encl

COMMENTS ON THE 1985 PROPOSED
GILA NATIONAL FOREST PLAN AND
SUMMARY DRAFT ENVIRONMENTAL IMPACT STATEMENT

Plan Page 1-4, Introduction, Purpose, Structure and EIS Page 1, Purpose

The purpose of the plan should be clearly restated and should include the ultimate purpose and responsibility to manage the federal estate so as to attain the greatest achievable long-term benefits to the public from the use and development of all natural resources, including grassland, forest, timber, minerals, oil, gas, water, wildlife, wilderness, recreational and other plant, soil and air resources in an environmentally sound manner. Then the entire plan should be thought through and the preferred alternatives weighed with this purpose and the public trust in mind.

Plan Page 5, Overview and Issues

Responsibilities for producing a plan which best serves the public trust are firmly established by federal law. The plan should therefore carry out the federal mandates in a logical and coherent manner. Public comments should identify concerns not otherwise considered, but not create deviations nor sway the intent from the mandated trust. For instance, there must be a balance between environmental concerns and the responsibility to maintain facilities and productivity. This is not clearly shown to be the case in the fact finding effort or in the preferred alternatives derived therefrom.

59-1

We generally agree with the purpose that you define. We also feel that this purpose was defined in the Plan when we stated "the Plan provides for integrated multiple use and sustained yield of goods and services from the Forest in a way that maximizes long-term net public benefits in an environmentally sound manner". The Proposed Action Alternative was developed with this purpose in mind.

59-2

We disagree that balancing environmental concerns and responsibility to maintain facilities and productivity was not accomplished in the Proposed Action Alternative. The draft Plan was developed to best resolve issues that were determined from public comments and from management concerns expressed by Forest Service employees. Changes in the final Plan are a result of public concerns expressed regarding the draft Plan. The final Plan is the combination of management actions that best resolves issues and concerns and provides for the maximization of long-term net public benefits within budget and environmental constraints.

LETTER 59

FOREST SERVICE RESPONSE TO LETTER 59

Plan Page 5, 18, 288-290, EIS pages 1, 23, 24 & 31, Produce Timber and Wood Fiber

The plan and EIS properly addresses the need for greater levels of timber, fuel and fiber production, but do not identify or propound solutions to potential conflicts. The plan states properly that there is limited supply available but is inadequate in that there is no identifiable plan to increase the available supply or to assess and reduce current levels of waste. For example, if 73% of the 3,342,608 acres is timberland and has one-half cord of fuel wood per acre, a fair estimate of 12,300,000 cords of potentially available fuel wood results. Only the 2,034,941 acres of timberland outside the wilderness is considered a fuel wood resource area leaving waste rate high within and without the 772,263 acres classified as wilderness.

Current levels of waste can be reduced. Prescribing controlled burning is not necessary where a greater level of public benefit is achievable. A more competent plan is to minimize the need for controlled burning and make the fuel wood resources available to the public and graze off underbrush wherever possible, whether in or out of the wilderness.

Plan Page 6 & 10, 49-281, 290-292, EIS page 1 & 22-23 & 36-40, Range Management

A re-examination of field data and the conclusions drawn for management areas 7A, 7F and 7G is requested. The credibility of the data is suspicious which led to the general statement that "current livestock use exceeds production capability." It is certain the numbers grazed have been drastically reduced historically and forage studies during drought years may have been used to establish grazing capacities in some cases, e.g., management areas 7A, 7F and 7G in particular. Any further reductions point to planned-for "mismanagement" in the cited management areas and are not in the public interest. There is a trend of misplaced public trust which says it is more convenient to "cut the permit" than to plan for improving facilities and management practices to increase productivity.

All plant and water resources could be better managed as a "flow" resources with planned-for reserve capacities that are adequate in the poor years, more than adequate in better years, and which limit excesses to avoid range fires or prevent waste in the most productive years. The livestock industry throughout the western states is heavily dependent upon public range land. The public interest is best served through developing mutual respect in an important management trust which is shared by federal range managers and permittees alike.

The plan could include annual range management seminars where common problems and up-to-date management practices can be discussed with permittees. Then individual range management plans between the district ranger and the permittee can be planned as at present.

59-3

We disagree with your rationale. In your first comment you suggest that the Forest should be managed for the long-term benefits to the public from use and development of all natural resources, including grassland..., wilderness ... " etc. In this comment you suggest that fuelwood should be removed from the wilderness areas. In the Wilderness Act, wilderness is defined as "an area where the earth and its community of life are untrammeled by man...". Fuelwood harvest is not compatible with this definition of wilderness.

We feel that the Plan provides the tools to reduce waste that you suggest is occurring. If grazing can be used to make browse available to wildlife rather than using controlled burning, it can be used. If fuelwood harvest can be used to accomplish fuel reduction after timber sales, it can be used. Often, however, these alternatives are not viable options. The Plan provides the objectives for particular areas. The exact tools that will be used to meet these objectives will be determined during project implementation planning (ground level). The management methods that are determined at the ground level will consider all of the things that you suggest.

59-4

We have re-examined the field data and the conclusions drawn for management of the range resource on the Forest. This re-examination has resulted in some change in individual areas but the overall level of grazing on the Forest is projected to remain at the approximate level proposed in the draft Plan. Changes in individual areas were the result of better coordination between the wildlife/grazing emphasis levels.

We disagree that any indicated potential reductions in permitted numbers of livestock is a result of planned-for mismanagement and that this is the "more convenient" management approach. If the Forest had unlimited budgets, improving facilities and management practices to increase productivity may be possible on most areas of the Forest. With existing constrained budget levels, trying to increase improvement levels on all areas of the Forest would be mismanagement of the range resource. With limited funds, it is only prudent to try to maintain as many permitted numbers on the Forest as possible by investing in areas that can sustain or increase the most animal unit months.

It is also important to note that exact numbers will be determined through standard allotment analysis techniques. If the areas that you are concerned about are at or below capacity as you infer, that will be determined during the analysis and appropriate actions will be taken.

59-5

We agree that range should be allocated in the manner that you describe. We also feel that the range analysis system used by the Forest Service accomplishes this. When we do range analysis, we generally gather data in three different years. As a result, we considered changes in the growth potential and were able to estimate growth in poor years, adequate years, and better years. We allocate based on our estimate of average years. We do these analysis and the subsequent management implementation plans in cooperation with the permittee involved to ensure mutual respect and trust.

59-6

Management plans will continue to be developed between the district ranger and the permittee. We will also continue to conduct meetings with permittees to discuss range practices and problems. This will be done with a group such as the grazing advisory boards (even though these boards are no longer sanctioned to be used in an advisory capacity). We do not feel that these activities need to be specifically spelled out in the Plan.

Plan Page 6, EIS Pages 10 and 29-31, Land Ownership

I support the acquisition of access rights-of-way and easements by the National Forest. Plans should address resolving the conflicts which will allow community development such as at Reserve, Luna, Silver City, Central and the Mimbres Valley. Land exchanges are long overdue in some locations. Disposal of certain tracts and acquisition of others should be planned to accommodate public needs, to resolve conflicts in ownership which have arisen because property corners established by earlier public surveys are different when compared to later resurveys and to consolidate ownership or improve management of public land. All tracts not required as a necessary part of the National Forest unit should be disposed of. The plan and EIS begin to address these issues and further consideration is warranted.

Plan Page 6, 9, 9-15, 295-296, 298, FIS Pages 8-9, 34-35 Recreation, Plan Page 7 Law Enforcement, Facilities

There is an apparent shortcoming in the numbers of and state of repair of facilities available for public use. These numbers have decreased between 1950 and 1985 by over 50%. (For example, public picnic tables, spring developments and trash disposal facilities along Burnum Road, Willow Creek, Wall Lake Road, the Catwalk.)

Vandalism is increasing at an alarming rate. These issues are not adequately addressed in the plan and EIS. More concern is advisable to meet the needs of those who have health restrictions or handicaps, as well as the ever-increasing needs of the general public.

Plan Page 7, 20, 209-243, EIS Page 5 22, Wildlife & Fish

I believe current levels of wildlife are underestimated in some instances, such as management areas 7A, 7F and 7G. There is considerable concern for the lack of improvements needed for better wildlife and fish management and increased productivity.

Plan Page 8, EIS Page 6, 15, 20, Transportation

It is disappointing to see a plan to increase restrictions for access and to reduce the value of capital improvements on forest lands.

Plan Page 8, 10, 42, EIS Pages 7, WildernessPlan Page 17, Facilities, Plan Page 13, Land & Special UsesPlan Pages 12, 292, Cultural Resources

Current management under wilderness status is proving to have serious adverse effects not addressed in the Plan and EIS. Many areas are over-impacted with firepits, trash, etc. such as Willow Creek, West Fork of the Gila River.

A few who live off the fat of the land are creating inordinate impacts for others who seldom are able to enjoy the outdoors. Stringent management requirements are creating a backlash which adversely affects safety such as the systematic removal of cabins and shelters. Many historical and cultural sites have been removed and obliterated (cabins, corrals, wild cow traps, early communication systems, fish ponds at the old White Creek fish hatchery with its power plant, etc.) The public trust is best served by a plan which considers these issues.

59-7

We feel that the availability of exchange lands is adequately addressed in the Plan. Exchange lands are available around most of the communities that you mention. These are provided to ensure that Forest personnel can respond to the need for community expansion.

59-8

We disagree that available recreation facilities have decreased dramatically on the Forest. Since 1950, the Dipping Vat Campground at Snow Lake has been constructed. Facilities have been provided at Quemado Lake and the Willow Creek Campground has been expanded. The catwalk has changed from a campground to a day use area but considerable effort has been made to reopen the area after recent floods. We do agree, however that some scattered picnic tables have been removed when they were no longer serviceable. Having these picnic facilities scattered over the Forest created an unmanageable situation. Having trash pickup scattered over the Forest also became unmanageable. It is much more efficient to have individuals carry out their own trash.

You also mentioned vandalism and handicap facilities. We feel we are fortunate to have a vandalism rate as low as it is on the Forest. The problem has not increased at an alarming rate as you indicated. As for handicap facilities, all new facilities are equipped for handicap people. Older facilities are modified to accommodate handicap people as facilities are reconstructed and when opportunities arise.

59-9

This same comment was made by several grazing permittees on the Forest. In response to this concern, wildlife numbers were reevaluated. In order to develop better population data, we asked for estimated population data from permittees, Forest employees at the district level, and the New Mexico Game and Fish Department. In cooperation with the New Mexico Game and Fish Department, we have developed revised population estimates. The final Plan incorporates these population estimates. The Plan also includes improvements needed for better wildlife and fish management and to increase productivity.

59-10

In response to public concerns, road maintenance levels have been increased somewhat in the final Plan. This will provide for higher maintenance levels of existing roads.

59-11

Wilderness is classified by congress. We will continue to manage these areas to maintain their natural primitive character. The Wilderness Act states that "wilderness is further defined as an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation..." In the past, permanent improvements were removed so the area could better meet this description. No further removal of cabins is planned.

You also referenced the fire rings and trash. In the past people were told to build fire rings to contain fires. Burying trash was an accepted practice. We are now stressing the use of low impact camping techniques. As more people become aware of these techniques, the situation that you describe should improve. However, there will always be some people that are not considerate of others and of the wilderness resource.

LETTER 59

General Comment

The Plan and EIS do not adequately address water management and the need to increase productivity. There are no new reservoirs planned.

Also, they fall short in providing for significantly increased development of mineral, oil, gas and geothermal resources. They seek to hold the status quo or to decrease exploration and development, which may not best serve the public trust.

12

13

FOREST SERVICE RESPONSE TO LETTER 59

59-12

In the development of the plan, we evaluated a benchmark that maximized water yield on the Forest. Few opportunities to increase water yield exist and the costs are very high.

You also mentioned the construction of reservoirs. The Forest Service is not empowered to study the need for water storage reservoirs or to construct such reservoirs. If reservoirs are recommended on National Forest system lands by the agencies that have this authority, we respond by providing information and commenting on the proposal.

59-13

We disagree that the Forest has not provided the opportunity for mineral, oil, gas, and geothermal resource exploration. With the exception of the classified wilderness and some specific areas withdrawn from mineral entry, the Forest is open for exploration. No road blocks to exploration have been added in the Plan.

LETTER 60

FOREST SERVICE RESPONSE TO LETTER 60

60-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 48 MMBF by the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data.

Over the last 10 to 15 years the Gila National Forest has sold an average of approximately 30 MMBF of sawtimber per year. Since a true price quantity demand projection could not be made, 30 MMBF has been projected as the demanded level. The benefit values have also been revised downward.

As a result of the changes discussed above, the timber allowable sale quantity has been reduced in the modified Proposed Action Alternative. In order to respond to the forest issues, the sawtimber volume of 30 MMBF is projected for the first decade (this is approximately 15 percent below the original Proposed Action Alternative). The cubic foot equivalent of this volume would be sustained over time. Timber outputs no longer increase. Using the silvicultural prescriptions proposed in the Plan, this volume can be sustained on approximately 62 percent of the tentatively suitable timbered acres.

Along with the changes in allowable sale quantity, the projected road construction miles would also change significantly. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projected construction of approximately 630 miles of roads. This is a 57 percent reduction in projected five decade road construction. There would be a reduction of approximately 20 percent in road construction and reconstruction in the first decade. Local roads constructed as a result of timber activities and not needed for administrative purposes would be closed. This would result in closing approximately 65 percent of the roads constructed.

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are difficult to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas is designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

000 60

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 18 '85

DATE RECEIVED

FOREST SUPERVISOR
GILA NATIONAL FOREST
2610 NORTH SILVER STREET
SILVER CITY, NM
88601

6 OCTOBER, 1985

FOREST SUPERVISOR:

THE FOLLOWING ARE MY
COMMENTS ON THE PROPOSED
FOREST PLAN FOR THE GILA
NATIONAL FOREST.

1. I OPPOSE ANY INCREASE IN
TIMBER HARVESTS OR ROAD
CONSTRUCTION TIMBERING AND
ROAD CONSTRUCTION DESTROY
REMAINING WILD OR UNDEVELOPED
LAND, CONFLICT WITH OR DAMAGE
OTHER USES, AND DO NOT HAVE
ECONOMIC JUSTIFICATION

LETTER 60

FOREST SERVICE RESPONSE TO LETTER 60

2. I SUPPORT WILDERNESS
DESIGNATION FOR LOWER SAN
FRANCISCO CANYON (6,700 ACRES),
AND HELLS HOLE (10,000 ACRES)

2

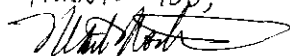
3. I SUPPORT MANAGEMENT OF
THE FOLLOWING AREAS AS ROADLESS
* AND UNROADED AREAS FOR CATTLE GRAZING

3

TO RETAIN THEIR VALUE
FOR ECOLOGICAL STUDY,
RECREATION, WILDLIFE HABITAT,
AND WATERSHED PROTECTION:

- AREAS ALONG THE MOGOLLON
RIM FROM THE BLUE RANGE
TO THE GILA WILDERNESS
(125,055 ACRES)
- FREESTANDING WILDERNESS
AREAS, SUCH AS FRISCO BOX
(40,000 ACRES) AND EAGLE
PEAK (30,380 ACRES), AND,
- AREAS ADJACENT TO ALDO
LEOPOLD WILDERNESS
(170,160 ACRES)

THANK YOU;



MARK MORTIER
625 FRANKLIN
SANTA FE, NM
87501

60-2

We have re-evaluated our recommendation on the two Wilderness Study Areas, but continue to support the non-wilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

60-3

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be effected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain their semi-primitive recreation opportunities. This means that only 3 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning individual unroaded areas on the Forest as modified in the Proposed Action Alternative.

LETTER 61

FOREST SERVICE RESPONSE TO LETTER 61



JAMES JORDAN JONES

Mr. Kenneth Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

6 October 1985

000 61

Dear Mr. Scoggin,

This letter is my response to and comments on the PROPOSED GILA NATIONAL FOREST PLAN and DFIS. Being a user of the Gila National Forest I am very interested in its future management. The PLAN and DFIS are very substantial documents - representing many man months of concerted effort by Forest Service employees. To comment on these documents in any great analytical detail is beyond my ability due to claims on my time by occupation and family. I have, however, studied the documents as best as time allows. My concerns are outlined in the following paragraphs:

All alternatives seem to emphasize consumptive uses of the forest rather than renewable ones with particular heavy emphasis on timber removal and grazing. I have long been concerned with soil replenishment - that is how long a time is required for development of new soil to replace soil carried off as removed trees and lost due to consequent erosion. The documents talk of the forests as ecosystems. Yet very little insight into the myriad interrelationships of plant and animal species is available in the documents! Certainly use of even age stand management and steep slope cutting will severely alter the forest ecosystem!

Wildlife is a significant part of the ecosystem - yet most emphasis is placed on harvestable wildlife. Non game species appear to count for little. Extensive road building and timber removal will greatly alter the present wildlife spectrum.

61-1

We disagree that all of the alternatives presented in the draft Environmental Impact Statement emphasizes consumptive uses of the forest rather than renewable ones. First, most resources on the Forest are managed on a sustained yield basis and are renewable. This includes timber and grazing. None of the alternatives presented eliminate one forest use to emphasize another use. The alternatives present a range of possible management outputs for the various resources and uses including the maintenance of undeveloped areas. Even though an analysis of the effects on undeveloped areas was not included in the draft (this has been corrected in the final), the alternatives did include a range of alternatives having varying effects of development on these areas.

61-2

We feel we have a good analysis of the effects of the planned activities on soil loss. Soil loss on the Forest was tracked in relation to range activities, timber activities, and road construction and reconstruction activities. These three types of activities have the largest potential to result in change in soil loss on the Forest. Some localized increases may be caused by ORV use, but these increases are not considered to be significant in relation to the changes in soil loss that can result from the three activities tracked.

The Plan states that soil loss due to management will not exceed soil loss tolerances. Tolerance soil loss is defined as the maximum rate of soil loss that can occur while sustaining inherent site productivity. This takes into consideration geologic erosion rates and soil formation rates.

61-3

We disagree that we have not adequately addressed the changes that will result from evenaged management and steep slope logging. We have addressed the effects of evenaged management and steep slope logging on soil loss, we have addressed the effects on wildlife and we have addressed the effects on diversity. We feel that we have adequately addressed the potential effects on the biological, physical, and economic environment. Without a more specific explanation of what effects need further analysis, it is not possible for us to respond to your concern in more detail.

61-4

We disagree that nongame species count for little. We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous forest habitats are maintained at a level that complements the forage habitats. Game species may appear to be solely emphasized. This does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species were included in the indicator species selected. Specific management practices for nongame species (the exception is T&E species) are not developed because of the large number of species and the magnitude of information that would be required to track each individual species. Effects of management activities on both game and nongame indicator species will be monitored.

I am greatly disturbed by the projected road building program. The road vs. trail building/reconstruction projections clearly show that recreation values are considered to be of minuscule importance, especially since the road building is largely a subsidy provided for the timber industry. I am afraid that no estimates are given for cost of timber sales preparations and expected revenue return therefrom in a form that the lay reader can easily review. When I write a scientific paper I present my data in graphs and figures so that the reader may easily understand what I have done and what my conclusions are. The PLAN and DEIS have not one graph and but one visual aid figure. The data is either strung out in endless tables or not available. Were graphs of recent and projected timber sale revenues and preparation costs included it would be immediately apparent, I believe, that the emphasis on timber sales is highly unjustified. I believe that roads built for timber removal (the PLAN states that many will be closed at completion of timber removal) should be paid for by the operator, not by the public. I urge that roads in the forest be kept to a minimum and that the trail system be maintained and improved.

When I write a scientific paper I present my data in graphs and figures so that the reader may easily understand what I have done and what my conclusions are. The PLAN and DEIS have not one graph and but one visual aid figure. The data is either strung out in endless tables or not available. Were graphs of recent and projected timber sale revenues and preparation costs included it would be immediately apparent, I believe, that the emphasis on timber sales is highly unjustified. I believe that roads built for timber removal (the PLAN states that many will be closed at completion of timber removal) should be paid for by the operator, not by the public. I urge that roads in the forest be kept to a minimum and that the trail system be maintained and improved.

ALAN L. FROST

81-5

Your comment seems to relate to four primary areas: projected road building, trail maintenance, timber costs analysis, and timber subsidies. In order to properly address these concerns we first need to review the changes that were made to the Proposed Action Alternative between the draft

The Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the draft was at approximately 35 MMBF per year in the first decade and projected to increase over time to 48 MMBF. The revised Plan projects timber harvest at 30 MMBF per year during the first decade. This amount is projected to remain at approximately the 30 MMBF level over time. Average production from the Gila National Forest for the past 14 years has been 30 MMBF. The existing allowable sale quantity is 54 MMBF. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads. This is a 57 percent reduction in projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed.

Along with the changes indicated above, the trail maintenance level has been increased to a level 288 percent above our 1984 trail maintenance level. In addition, 97 percent of the existing unroaded area on the Forest would be managed to maintain its semi-primitive recreation opportunities. We do not feel that this indicates that we consider recreation values to be of minuscule importance.

The reason timber costs and timber benefits were not displayed is that it is not accurate to single out individual costs and assign single benefits to these costs. Cost and outputs are related just as environmental factors are related. No single costs results in a single benefit. As an example, costs that are called timber costs are used to plan and administer timber sales. In the project planning phase of a timber sale, integrated stand management techniques are used to insure that diversity of wildlife habitats is maintained or increased. The timber harvest activities open up some stands which provide additional wildlife forage. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this activity, even though the activity benefits wildlife as well as timber, are called timber funds. The same is true of range projects. As a result of this joint production situation, all costs have to be considered in relation to all outputs.

In your response you also infer that the Forest Service should not subsidize timber operations the expense of the American taxpayer. As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber contractors or any other interest group as being the sole recipients of a federal subsidy. Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

61-6

I decry the trend toward cable logging of steep slopes. This will wipe out much wildlife habitat and seriously impact water retention and soil conservation.] 6

Livestock grazing in the Forest should be reduced. I have seen many areas in New Mexico where the forest floor has been adversely affected due to excessive livestock use. This problem should be corrected. The indigent animal populations have a prior right to grazing resources.] 7

As a result of your concern and the concerns expressed by others regarding steep slope logging, we re-evaluated the steep slope logging in the Proposed Action Alternative. We tested the economical efficiency of logging cable areas and non-cable areas and found that when the Forest offers 30 MMBF of sawtimber in the first decade, in combination with the new timber benefit values used in the final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with cost. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with only tractor yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than the volume allocated in the final Plan. This is because of the relatively high volume per acre on some of the steep slope portions of the Forest. These results are consistent with experience on other forests in New Mexico.

Considering the concern by your organization and others for steep slope logging on the Gila and the fact that the timber industry has made a financial commitment to log such areas (through the purchase of equipment) we felt that a constrained level of 5 MMBF logged annually with cable systems was a good compromise level. This level was also based on the concern expressed over total acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage is required to be logged than if a comparable volume was taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent sloped and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would be managed in all of the Logical Timber Management Areas on the Forest. We did not feel that doing this would be very responsive to your concern related to entering presently undeveloped areas. Logging some cable volume results in less acres being logged in the first decade and more area remaining unharvested.

We do not feel that the level of steep slope logging proposed will have a serious impact on wildlife habitat, water retention or soil conservation. On the average, only about 900 steep slope acres out of the 432,000 tentatively suitable timber acres will be logged annually. Sale layout will provide for the wildlife habitat diversity on a sustained basis. Soil disturbance is actually less from cable logging than from tractor logging. Mitigation measures will minimize soil loss. Soil loss will not reduce the productivity of the site. Since site disturbance will be low, water retention should not be significantly reduced.

61-7

The Proposed Action Alternative is projected to result in a 10 percent decrease in permitted livestock on the Forest but our primary goal is to improve the condition of the range resource. In the Proposed Action Alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary somewhat from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

A serious weakness in the planning process, in my opinion, is the attempt to reduce every aspect of the forest to a number that can be juggled in a computer. Evaluating wildlife in terms of thousands of Recreation Visitor Use Days is preposterous! This is another example of the emphasis on game animals (consumptive use) and crass disregard for the non game species.

8

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

61-8

We disagree with your conclusion that wildlife was evaluated only in terms of recreation visitor days. Wildlife recreation visitor days were used to evaluate the economic effects of wildlife management activities. This was but one consideration. Wildlife was also evaluated with respect to species present, populations, and habitat requirements.

The first step in the developing wildlife data and wildlife relationship information for the Plan was to define indicator species. Utilizing the Forest's current inventory of vertebrate species, a tentative indicator species list was developed which approximated one or more of the following criteria:

Occurs commonly as a summer, winter, or yearlong resident.
Species distribution involves a relatively large portion of the Forest.
Listed as a Game Species, a threatened or endangered species, or a regionally sensitive species.

The tentative indicator species list was reduced using the following criteria:

Species habitat requirements too broad. Species populations not sensitive to changes in successional stages of vegetation type on a detectable basis.
Species whose habitat requirements were not sufficiently defined to allow documentation of change or monitoring (provided known requirements could be addressed by an associated indicator species).
Species whose habitat requirements within a given vegetation type would be met by habitat needs of other selected species.

Additional refinement included wildlife and fish species whose habitat requirements would address high, moderate, or low serial stages within each vegetative type represented.

After indicator species were developed, primary habitat components to be tracked were selected. The number of components that could be tracked were limited because of modeling considerations, but the final list was considered to be sufficient to project anticipated effects on indicator species. The habitat selected were old growth, cover, turkey roost habitats, squirrel habitats, and herbaceous forage and cover habitats. Even though some of these habitats were named for a specific species (turkey, squirrel) the characteristics of these habitats apply to the habitat requirements of other indicator species.

Quantities and distribution of primary habitat components necessary to maintain minimum viable populations of all indicator species were then defined. Distributions took into consideration the maintenance of viable gene pools. No alternative was developed that reduced habitat levels below the level necessary to maintain viable populations.

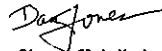
LETTER 61

The best environment for maintenance of a broad range of species is wilderness. The ELAN recommends no area for wilderness classification. I believe the two WSA's presently defined in the Gila National Forest plus other suitable areas should be added to the list of areas so that they can be considered for wilderness classification in the next cycle. 9

In conclusion I express my disappointment that Alternative F was not chosen as the Preferred Alternative. I urge you to reconsider and designate Alternative F as the Preferred one. I believe it to be the environmentally and fiscally preferred alternative. 10

Thank you for this opportunity to comment on the FLAN.

James Jordan Jones



Sierra Club Member and Rio Grande Chapter vice-chair
1201 Flor del Valle
Socorro, NM 87801

FOREST SERVICE RESPONSE TO LETTER 61

Once minimum viable population habitat levels were defined, prescriptions were developed that provided habitat level above the minimum level. Effects of other resource activities were integrated into prescriptions so that total management effects, costs, and outputs could be projected. [A copy of the wildlife section of the Outputs Technical Report has been provided to the Sierra Club. This describes this process in much more detail.]

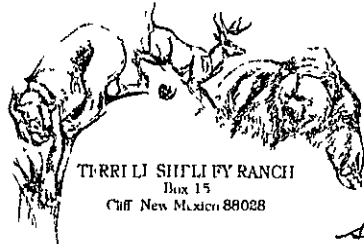
As can be seen from the above discussion, wildlife MRVDs were not the only parameter used in evaluation of habitat trends. Wildlife related RVDs were used as an economic indicator of the value of wildlife so that the economic model would have some basis for comparing the value of wildlife to the value of other resource outputs. The RVD amounts were based on the assumption that where habitat and populations of big game, upland game, waterfowl, fish, and nongame species change within a given area there is a corresponding change in the attraction of associated wildlife recreation. The use of wildlife recreation along with these other habitat parameters is considered valid in projecting a picture of anticipated wildlife outputs. Effects on wildlife were evaluated by looking at changes in habitats and the effects of other resource activities and not simply by reviewing RVD levels. 61-9

We agree that some areas on the Forest should be available for considered for wilderness when the Plan is redone in 10 to 15 years. We feel that the modified Proposed Action Alternative is very responsive to this concern. Changes made as a result of public concerns and changes in the amount and location of timber harvest activities has left in a significant portion of the undeveloped areas of the Forest undeveloped. Please refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning this topic.

We have re-evaluated our recommendation on the Wilderness Study Areas, and continue to support the non-wilderness recommendation. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning this recommendation.

61-10

Alternative F has the highest PNW, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

Terrell
&
Charkene

000 62

Terrell
&
Tonya

Sept 30, 1985

Mr Kenneth Scaggins
Gila National Forest
2601 N Silver Street
Silver City, N Mex 88061

U.S. NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 08 '85

DATE RECEIVED

Dear Mr Scaggins

In Reference to your Gila National Forest planning proposal, Management area 76. You state that by the fifth decade the current level of 1,705 WAUM will increase 50% and the present 4224 AUM of livestock will decrease by 50%. I think that the WAUM figures used in the proposal are way below the present number of deer and elk that use the area with the present number of livestock there doesn't seem to be any conflict if you start reducing the livestock numbers you are going to reduce your wildlife numbers. It is a proven fact unless you have all ready taking the livestock out of the wilderness area you don't have any wildlife you don't have anything but a jungle and a fire hazard.

The Game & Fish Department made a deal with the Forest Service to introduce the Elk and Big Horn Sheep on Forest lands. These animals are not staying on Forest lands, they have moved mainly down on private lands to the south without the landowners permission. I think that this should be taken into consideration because the Wildlife is not doing just

Makes less ~~forage~~ forage for the livestock that can be run on private lands. There needs to be some type of management of the Wildlife besides the present system because they are overstocked in places and have absolutely none in other places. If a permittee managed his livestock the way the Wildlife is managed he would be out of business in some places.

62-1

We agree with your estimate of wildlife numbers in management area 76. Our ability to gather good data on existing wildlife numbers as well as the degree of overlap between wildlife and livestock is limited. The Forest has taken this into consideration and has revised the wildlife estimates based on a review of the numbers and coordination with local ranchers, New Mexico Game and Fish, and Forest personnel. We feel the data is adequate to base management direction, but actual on-the-ground conflicts will ultimately determine stocking adjustment. The Forest Plan provides the management direction for a given area based on projected resource needs and demands.

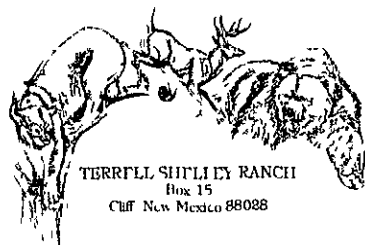
62-2

Wilderness areas where livestock and fire have been excluded are, as you suggest, growing over and moving toward a higher seral stage of development. A higher seral stage of vegetative development will benefit certain species of wildlife while other species will decline. Deer require a lower seral stage of vegetation development. Species diversity, through vegetation diversity, can be attained in wilderness using fire as a natural management tool. With increased fire emphasis in the Forest Plan for fuels reduction, some improvement will occur in the form of vegetative and species diversity in the wilderness.

62-3

Elk and Big Horn Sheep were once abundant on the Gila National Forest, but without regulations to maintain and protect their habitat and reduce hunting pressure, the species has declined. The reintroduction of these species into their native range has been successful, unfortunately wildlife species cannot be regulated or managed to stay on National Forest lands. To help remedy this situation, we have added a Forestwide Standard and Guideline stating that we will "work with the New Mexico Game and Fish Department to identify and minimize conflicts which may result if wildlife move off public lands."

Terrill
&
Charlene



Terrill
&
Tonya

The two allotments in this area are both under a management plan and are both in a lot better condition than they were several years ago. The Ranger District tells you that they are and that everything is fine. Then they import some people that are supposedly better educated and from a completely different environment and they say it is in poor condition according to their data. It has been my observation through the years that I have been a permittee that their data can be interpreted however they see fit to benefit the Forest Service.

The person that knows what is best for the allotments is generally the person who has been there all his life. Not someone from a different part of the country that comes in and opens the file and says this is what we are going to do. That is not the way it should be done.

If all the money that was spent on preparing this plan would have been spent on Range Improvements, permittees, Forest Service and Wildlife would have all benefited from it.

I hope that you will see that the permittees are what

balance without them you have no Wildlife or livestock. Nothing!

Sincerely yours
Terrill Shutley

62-4

We disagree that the ranger district is telling you--the permittee--everything is fine and management team is telling you the range is in poor condition. The range data collected over the years indicates that large areas of rangeland shows improvement. It also identifies areas where livestock are in conflict with other resources. The existing allotment management plans for area 7G allow for a high livestock emphasis level requiring high costs to implement. The emphasis in the Forest Plan for management area 7G is one of enhancing wildlife. Management with this emphasis in mind suggests we may need to modify our existing plans to meet the projected demands. Should the degree of overlap between livestock and wildlife species not create the anticipated conflicts identified in the plan, a new Forest-wide Standard and Guideline has been developed to provide for additional forage allocation to livestock.

62-5

We disagree. The Forest Plan is a very complex document requiring data from all functions as well as a knowledge of the interrelationships of all resources. Management decisions were made based on issues which were generated from five public meetings, demand projections, and the ability of the Forest to produce goods and services to meet those demands. The final decision was a Management Team decision not an individual decision by someone who... "opens the file and says this is what we are going to do." as you contend.

62-6

The help and cooperation provided by the permittees is very much appreciated and the overall condition of the Forest resource is very much improved as a result. Multiple use of the National Forest, however, intends to provide for all resources on a limited land mass. Permittees and other users alike, play a vital role in balancing the resource outputs.

000 63

GILA NATIONAL FOREST
Superior, AZ

OCT 08 '85

Oct. 3, 1985

DATE RECEIVED

Dear Sirs:

I would like to express my opinion about the proposed Gila National Forest plan.

First of all I'd like to tell you that the Rice Family has been ranching in this area for a long time & they always kept the rules given them as permittees. They never over grazed. The cattle were never put on early nor taken off late. Whatever the Forest office or Ranger told them, they have tried to be agreeable & now you are trying to take half of their living away from them so you can turn it over to the wilderness. That means to the Hispanics to a great extent - who are probably on welfare & will go up there & plant marijuana to be peddled to your kids & mine or grandchildren whichever the case may be. We've had two marijuana farms found here. This kind of people don't pay taxes & do nothing for our government why should they have more land at their disposal.

Also your proposal would help the sportsman, but once you cut the ranchers out there will be no predator control & do you know what they do to game animals? Shortly there would be none

63-1

The help and cooperation provided by the permittees is very much appreciated and the overall condition of the Forest resource has improved significantly as a result. Multiple use of the National Forest does however, provide for more than one use on a limited land mass. Livestock grazing as well as all other resources must co-exist on the same land and operate under the same budget constraints. With increasing demands for all resources and the Forest responsibility to allocate these resources, every one may not get all they want or what they have become used to. It must be kept in mind that all decisions concerning adjustment in AUMs will be determined using standard allotment procedures and may vary some from the currently projected levels. No proposal in the Plan recommends conversion of rangeland to "wilderness".

then you all the money, you thought
it would be coming from here.

Many of our neighbors will be in
worse shape than we are if you
cut their permits as they have been
~~potential~~ patented land & depend on the
forest. It seems very unfair to let
these people who work hard to make
an honest living, so others can play
or make a dishonest living using their money.

Have you ever wondered what will
happen to the people in this country
when we get through paying all the taxes
and putting the economy out of business?
What are you going to do? I have worked
with a computer which these people
put into the computer & come up with
a lot of stuff. It's on this
computer. I'm not sure, but
the computer says there are some
the computer must have looked that
they could now address to protect
an endangered species which doesn't
exist.

I'm very definitely against this project
as I don't see that it's good for us.
I hope you will re-evaluate it. It is
back of the way it is.

Sincerely,
Lester Hines

63-2

Costimundi have been trapped as far north as Glenwood, New Mexico and have
been seen as transient in the major drainages to the Gila. There have been
no reports of Costimundi in Management Area 7G however, the Proposed Plan
did identify these as potential areas for recovery. Following an additional
review, the Costimundi were dropped from the T&E species list in Management
Area 7G.

63-3

Management of the National Forest is a dynamic process that must adjust to
provide for changing demands and budgets. Under current management the
Forest is supporting 383,000 AUM's of grazing. If our current management
continues, permitted AUMs are expected to decline to 338,000 during the
first 10 years and to 289,000 by the end of 50 years. This decline is a
result of the inability to replace existing improvements as well as the need
to get permitted numbers equal to forage capacity. The objective of the
Proposed Action Alternative is to resolve major issues and management
concerns with a mix of market and nonmarket outputs. Range permitted animal
unit months are expected to decline to 347,000 during the first 10 years
and then to increase to 350,000 by the end of 50 years. The Proposed Plan
includes additional funding to help sustain existing livestock improvements
and a management emphasis change from a high level on all allotments to one
that varies in management intensity according to cost, demands, and
conflicts to be resolved.

LETTER 64

FOREST SERVICE RESPONSE TO LETTER 64

64-1

1 NATIONAL FOREST
Silver City, New Mexico

000 64

OF 11/8/85

DATE RECEIVED

606 Alto Street
Santa Fe, NM 87501

October 4, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Forest Supervisor

We were incredulous to learn that none of the 750,000 Gila National Forest acres reviewed in the RARE II process were recommended for wilderness designation. We find an increase in timber harvests and road construction in this area totally unacceptable. Such use is not only damaging to recreational uses and destructive to wild areas, it is unsound economically.

In 1980, when the New Mexico Wilderness Act was passed, the Gila had approximately 753,195 acres of undeveloped area (not including Wilderness and Primitive Areas). The New Mexico Wilderness Act designated approximately 39,275 undeveloped acres Wilderness and it released approximately 5,705 acres that were previously classified as Primitive. Since 1980, approximately 21,000 acres have been developed. This leaves approximately 699,000 acres of unroaded area on the Forest (including the two Wilderness Study Areas). Chapter 4 of the Environmental Impact Statement has been amended to show the effects of all alternatives on the 699,000 undeveloped acres outside of classified Wilderness. In the first decade the Proposed Alternative will result in the development of approximately 21,000 acres (3 percent) of the 699,000 undeveloped acres on the Forest. The areas not proposed for development as part of the planning process (including the Wilderness Study Areas) will be managed to maintain their semi-primitive recreation opportunities. Over 97 percent of the undeveloped area on the Forest will still be undeveloped when the Plan is redone in 10 to 15 years. These areas will be reconsidered for wilderness designation when the new plan is prepared.

64-2

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade, and projected to increase to approximately 48 MMBF by the fifth decade. The first decade level and the increase in timber outputs over time were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data. The sawtimber volume of 30 MMBF is projected for the first decade (this is approximately 15 percent below the original Proposed Action Alternative). Timber outputs no longer increase over time. Please refer to the Proposed Action Change Summary at the beginning of this document for specific details concerning the modified Forest Plan timber program.

Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are difficult to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

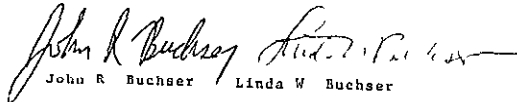
Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas is designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

In particular, we want to see the Lower San Francisco Canyon] 3
 and Hells Hole areas designated as wilderness. Additionally,
 there are other fine areas that should be managed as roadless,
 undeveloped semi-primitive areas for non-motorized recreation
 It is imperative to protect their watershed, wildlife habitat,
 and ecological study values. These areas would be the Frisco
 Box and Eagle Peak scerages, the areas adjacent to Aldo Leopold
 Wilderness, and along the Mogollon Rim from the Blue Range to
 the Gila Wilderness] 4

Any benefits gained by additional logging are so far out-
 weighed by the ecological and recreational value of leaving
 the land unmolested that we most strongly urge you to cancel
 plans for logging and road construction. Don't squander our
 money destroying the irreplaceable qualities of our Gila National
 Forest.

Sincerely,


 John R. Buchser Linda W. Buchser

64-3

We have reevaluated our recommendation on the two Wilderness Study Areas,
 and it is our feeling that a nonwilderness recommendation is appropriate.
 Please refer to the Wilderness Study Area section of the Proposed Action
 Changes Summary at the beginning of this document for a more detailed
 discussion of this recommendation.

64-4

Because of changes in the amount and location of timber harvest activities
 and changes made as a result of public concerns, the modified Proposed
 Action Alternative more favorably addresses the concern that a significant
 portion of the undeveloped areas remain undeveloped and available for
 semi-primitive recreation opportunities. Again, refer to the Proposed
 Action changes Summary at the beginning of this document for more discussion
 concerning the undeveloped areas on the Forest.

LETTER 65

FOREST SERVICE RESPONSE TO LETTER 65

Doc Campbell

Gila Hot Springs
HCR 88072, 3796 Hwy 15
October 5, 1985

Silver City New Mexico 88061

000 65

GILA NATIONAL FOREST
SILVER CITY NEW MEXICO

OCT 08 '85

DATE RECEIVED

Mr Kenneth C Scoggin, Forest Supervisor
Gila National Forest, USDA
2610 N Silver Street
Silver City, New Mexico 88061

Dear Mr Scoggin

Thanks for the opportunity to review and comment on the
"Draft Environmental Impact Statement for the Gila National Forest." Based on
a lifetime within the Gila National Forest, and working within the limitations
of these natural resources, I hereby offer some suggestions, observations of
past practices, and recommendations

First, the Gila is a unique climatic and geological area,
different from every other National Forest

Due to the fact that the social, economic and political
needs of the Southwest differ from the rest of the United States, priorities
for uses of these resources should be made clear to everyone The Draft EIS ap-
pears to be governed by a master format made to conform to national preferences
which do not respond to local and regional concerns

Water is the most scarce resource in the Southwest It
is expensive and almost impossible to import The present amount of water, or
the yield from the Gila National Forest watershed, is over-appropriated

65-1

We agree the format for the Forest Plan and the DEIS were designed to
conform to national needs and standards and that the documents are very
technical. We disagree, however that local and regional needs were not
considered in the planning process. The local and regional needs and
concerns were first analyzed during issue generation phase of the process.
The generation of issues to be addressed in the Plan came about during five
public meetings held at Reserve, Silver City, T or C, and Las Cruces, New
Mexico, and El Paso, Texas. Local and regional concerns have also been
addressed between the draft and final documents. Changes were made in the
final Plan to help address concerns expressed during the public involvement
period for the draft planning documents. We feel the local and regional
issues have been addressed.

65-2

We agree, water is an important resource in the Gila National Forest. Water
quality, water quantity yield, and timing of water flows are attributes of
the water resource addressed in our proposed plan. Our basic means of
managing these water attributes is through maintenance, improvement, and
manipulation of vegetation on the Forest's watersheds.

Best Management Practices (BMP) to maintain water quality and reduce soil
erosion will be prescribed on a project by project basis for projects which
involve the removal of ground cover. All alternatives considered result in
soil loss reductions over time.

Floodwater detention is addressed through the maintenance and improvement of
watershed conditions rather than through floodwater storage reservoirs.
Watershed conditions are improved by improving vegetation and ground cover
and thus enhancing the soil infiltration capacity and surface detention
capacity.

We analyzed the potential for increasing water yields through vegetation
manipulation and snow fencing. However, the potential to increase water
yield must be balanced with other environmental concerns and other resource
management objectives. The environmental trade offs and costs involved in
providing a significant increase in water yield exceed the benefits which
can be realized from a high water yield alternative.

LETTER 65

Erosion and loss of riparian habitat are watershed problems that have been caused mainly by climatic and vegetative changes. In the mid 1930's, gateless areas, closed to domestic stock, along stream bottoms,

were very successful in slowing erosion and establishing riparian areas. More areas should have year-long protection as well as grazing rotation plans that will permit the scoured stream-bottom areas to recover.

Outdoor recreation is also a local and regional concern. While there have always been some who travel great distances for outdoor pleasures, the greatest demand on the resources within the Gila National Forest is by families and sportsmen living within a day or less of travel time to the Gila.

In my 50 years within the Gila National Forest, I have seen many changes that have altered the vegetative, riparian and wildlife resources. Total fire suppression failed to limit or curtail erosion. The riparian habitat is in worse shape now than it was 35 years ago.

Removing domestic livestock from most of the Gila Wilderness did not increase the deer, turkey and native game animals. The introduced elk have multiplied, but at a rate much below that projected. In depth research by professional game biologists in Utah, Arizona, Idaho, Montana, and New Mexico, and locally at the Fort Bayard Reservation, prove that only a small percentage of fawns live to maturity. Depredation to elk calves has been documented as extensive in a Montana report. The Biological Survey hunters and trappers with the New Mexico Predator Control force, limited losses to domestic stock and to wildlife. This was prior to the mid 1950's. In the 1930's the Federal Government also made funds available to the State Game and Fish Department to hire trappers and lion hunters with dogs to work in the Gila National Forest. Grant County has paid bounty on both coyote and mountain lion, the principal predators of domestic stock and wildlife. Also, many of the ranchers gave both financial and "in kind" support to fur trappers to operate a trapline on their ranges or permits. Modern fur trappers travel along their traplines by vehicle, therefore the areas trapped are limited, leaving the Wilderness and the rugged mountains as breeding grounds for predators. Now that predator control has ceased in the Gila National Forest, wildlife must become the prey to meat eating predators.

FOREST SERVICE RESPONSE TO LETTER 65

65-3

We agree that improvement of riparian habitats is extremely important. To clarify our management objectives, the following standards and guidelines have been added to the Forest-wide Standards and Guidelines.

When possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted to ensure the protection of these key riparian areas.

Grazing in riparian zones will be managed to provide for maintenance and improvement of these important areas.

When possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines identified above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These

standards and guidelines give some specific long term goals to reach concerning riparian condition.

The changes in the Proposed Action Alternative are expected to result in improvement in riparian habitat condition over time. The Chapter 4 section of the Environmental Impact Statement has been rewritten in order to better address the differences the effects the alternatives will have on riparian habitats. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

65-4

Forest personnel are not responsible for predator control on the Forest. The U.S. Department of Agriculture's Animal and Plant Health Inspection Service, Division of Animal Damage Control (ADC) cooperates with the New Mexico Department of Agriculture in a program of animal damage control. However, the New Mexico Department of Game and Fish is responsible for predator problems caused by bears and cougars. We will continue to cooperate with these agencies in their predator control efforts.

LETTER 65

FOREST SERVICE RESPONSE TO LETTER 65

Prescribed burning as permitted during 1985 should be continued and where necessary some areas should be torched to make way for more beneficial growths

5

The fisheries within the Gila National Forest cannot supply the demands for sport fishing. Most of the streams are not accessible by road. Wilderness designation prohibits stocking streams by helicopter.

Hopefully, the final EIS will respond more fully to the social-economic requirements of the Southwest when allocating the use of natural resources in the Gila National Forest.

Sincerely,



Doc Campbell

65-5

Prescribed burning will continue on the Forest. This effort is intended to eliminate residues that cannot be beneficially utilized. It can be used to stimulate sprouting of some of the desirable browse species that may have grown out of the reach of wildlife, or at a stage of successional development requiring regeneration. The main intent of the prescribed burning program is to keep the buildup of fuels within acceptable limits. Planned ignition will be used in the wilderness where it can be shown to improve wilderness values.

LETTER 66

FOREST SERVICE RESPONSE TO LETTER 66

66-1

The Fort Bayard Area is currently provides approximately 600 AUMs of forage annually. This is a very low level of livestock grazing and does not conflict with the wildlife objectives for the area. The Plan would maintain this level of grazing. The area will continue to be managed on an annual basis. Term permits will not be issued.

66-2

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 48 MMBF by the fifth decade. This increase was a result of the timber benefit values used in the alternative and the projected future need. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative proposes a sawtimber harvest of approximately 30 MMBF the first decade and is scheduled to remain the same overtime. This level is equal to the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

As a result of your concern and concerns of others, we have re-evaluated the level of steep slope harvest in the Proposed Action Alternative. We tested the economical efficiency of logging cable areas and non-cable areas. With the Forest providing 30 MMBF of sawtimber in the first decade and with the new timber benefit values used in the Final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with costs. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with only tractor yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than the volume in the Final Alternative. This is because of the relatively high volume per acre on some of the steep slope portions of the Forest. These results are consistent with experience on other forests in New Mexico.

Considering the public concern regarding steep slope logging on the Gila and the fact that the timber industry has made a financial commitment to log such areas (through the purchase of equipment) we feel an average harvest level of 5 MMBF of steep slope volume annually is a good compromise level. This level also gives consideration to the concern expressed over total acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage needs to be logged than if a comparable volume were taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent slopes and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would have to be managed in all of the Logical Timber Management Areas on the Forest.

Robert M. Langsenkamp, Jr.
2825 Don Quixote
Santa Fe, NM 87505

000 66

10/4/84

GILA NATIONAL FOREST
SILVER CITY, NM

OCT 04 1984

OFFICE

Mr. Ken Scoggins
Supervisor
Gila National Forest
2610 North Silver
Silver City, NM 88061

Dear Mr. Scoggins:

I would like to make the following comments on the Draft of the Gila National Forest Plan.

First of all, the Fort Bayard Area should not be opened to livestock grazing (or continue to be opened, if it has already). This is one of the finest wildlife areas in the southwest, in my opinion, and its value as baseline against which to measure grazing management in similar habitats, far outweighs its forage value.

Timbering should not expand at the rate projected under PA. To do so would increase the dollar losses of the timber program. Also, it would necessitate cable logging. Not enough is known about the effects of this form of logging on sedimentation etc., to propose employing it at this time.

LETTER 66

FOREST SERVICE RESPONSE TO LETTER 66

Likewise, expenditures on grazing improvements throws good money after bad. Stocking levels should be adjusted downward to actual carrying capacity, rather than making heavy investments to do the opposite.

In most instances the best management is the least management. This is certainly the most cost-effective management. Therefore, I recommend that no timbering or grading be planned for the following areas that were identified as roadless in RARE II

Apache Mtn #145	17,000 acres
Frisco Box #146	40,000 acres
Aspen Mtn. #148	22,000 acres
Wagon Tongue #149	11,000 "
Eagle Peak #150	30,500 "
Deep Creek/Devils Creek Complex #151	120,000+ acres
Gila Middle Box #152	24,000 acres
T Bar #154	7,000 acres--no additional range
Canyon Creek #155	9,500 Acres improvements

Areas Contiguous to the Aldo Leopold Wilderness including Taylor Creek 120,000 acres ±

Largo #163 13,000 acres

Sawyer's Pk. #164	65,000 acres
Nolan #132	19,000 acres
Mother Hubbard #134	9,000 acres

Hell Hole and the Lower San Francisco Box should both be recommended for Wilderness in any alternative. Also, the 6,000 acre further planning area of the LSF is pathetically small and totally arbitrary. It includes only the main canyon and ignores the extensive complexes of side canyons, where much of the wildlife, scenic and scientific values are contained. If anything, the side canyons are even wilder than the main canyon. An additional 19,000+ acres should have been recommended for wilderness by the USFS during RARE II. The Gily can rectify the situation during the planning process by recommending the 6,000 acres for wilderness and managing the side canyons as roadless. This would constitute an area of approx 25,000 acres.

Thank you for your consideration of these comments.

Sincerely,

Bob Longworth

66-3

We appreciate your advice regarding the management of livestock grazing on the Forest, but we continue to feel that the level of livestock grazing projected in the Proposed Action Alternative is an appropriate and attainable level that will result in improvement of riparian zones and the protection of environmentally fragile areas. In the Proposed Action alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

66-4

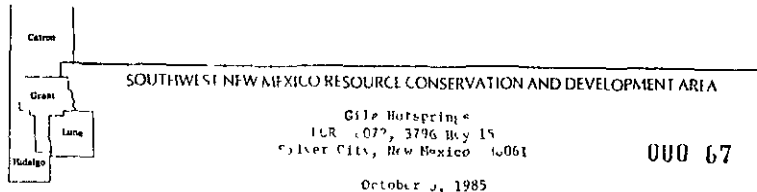
Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain their semi-primitive recreation opportunities. As a result, only 3 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. Please refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the undeveloped areas on the Forest.

66-5

We have re-evaluated our recommendation for the two Wilderness Study Areas and continue to support the nonwilderness recommendation. Again, refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

LETTER 67

FOREST SERVICE RESPONSE TO LETTER 67



Mr. Kenneth C. Scoggin, Forest Supervisor
Gila National Forest, USDF
2610 N. Silver Street
Silver City, New Mexico 86301

October 3, 1985

000 67

Mr. C. J. H. H. H.

001 05 08

DATE 11/11/85

Dear Mr. Scoggin:

The Chairman of the SWNM RCD Council has designated the Forestry Committee to review the Draft Environmental Impact Statement, and to prepare an RCD position paper for presentation to the Supervisor of the Gila National Forest.

The proposed plan of action and the six alternatives do not conflict with the natural resource deficiencies of the area. Priorities should be given to the resources that can best benefit the social, political and economic necessities of the Southwest.

1. Water should be given the highest priority of all natural resources in the Gila National Forest. This includes erosion control measures, floodwater storage, vegetative manipulation and all other methods that increase stream flows and recharge under ground aquifers.
2. Cattle grazing and harvestable wildlife are compatible and complementary with proper management.
3. Outdoor recreation areas and facilities for various outdoor recreational uses and non-harvestable wildlife fit into this category.
4. Timber, saw lumber and fuelwood. Silvicultural practices have been developed that benefit water yield, grazing, wildlife and visual qualities.

Any use of the land that is not compatible with the above listed priorities should be avoided.

67-1

We agree, water is an important resource in the Gila National Forest. Water quality, water quantity yield, and timing of water flows are attributes of the water resource addressed in our proposed plan. Our basic means of managing these water attributes is through maintenance, improvement, and manipulation of vegetation on the Forest's watersheds.

Best Management Practices (BMP) to maintain water quality and reduce soil erosion will be prescribed on a project by project basis for projects which involve the removal of ground cover. All alternatives considered result in soil loss reductions overtime.

Floodwater detention is addressed through the maintenance and improvement of watershed conditions rather than through floodwater storage reservoirs. Watershed conditions are improved by improving vegetation and ground cover and thus enhancing the soil infiltration capacity and surface detention capacity.

We analyzed the potential for increasing water yields through vegetation manipulation and snow fencing. However, the potential to increase water yield must be balanced with other environmental concerns and other resource management objectives. The environmental trade-offs and costs involved in providing a significant increase in water yield exceed the benefits which can be realized from a high water yield alternative.

67-2

We agree that cattle and wildlife are compatible and complementary within limits. However when cattle and wildlife numbers become too high, they compete for the same food supply. This is the situation on some portions of the Forest. The Plan provides for the management and compatibility of the two by allocating forage for both. By doing so, at least a portion of the demand for both can be satisfied.

67-3

We agree.

67-4

We agree that silvicultural practices have been developed that benefit water yield, grazing, and certain wildlife species. Visual Quality can be protected. We have included these systems in the Plan. As a result, water yield increases somewhat from areas that are harvested and forage for wildlife and/or cattle is increased.

LETTER 67

FOREST SERVICE RESPONSE TO LETTER 67

5 5 Riparian habitat Most recent losses to riparian habitat in the Gila have been caused by stream erosion Watershed improvement, some alterations in grazing practices and wildlife management will reclaim much of the habitat

6 6 Soil loss will decrease naturally if the first five concerns are addressed properly

7 7 Rare and endangered species of wildlife The Gila National Forest is not an important or critical nest area for Bald Eagles or Black Hawks, or any other endangered wildlife

8 8 Fisheries depend primarily on the management of watershed and various erosion control practices

9 1 Water Passive protection works well on grasslands that can support heavy turf Land that has heavy pinyon, juniper and oak growths does not become productive watershed areas by decreasing AUM's Invasion into grasslands of heavy stands of juniper-pinyon growth, as well as of Ponderosa pine, accelerates erosion The Draft EIS discounted the possibility of increasing water yield, due to the limited amount of acreage suitable for vegetative manipulation and the cost-benefit ratio of any active methods

The cost of purchasing senior water rights have increased approximately one thousand percent in recent years Silver City has put a \$1,250 fee for each new family tap outside the city limits into the city water system This fee is to be used for the purchase of more water rights With the present immigration trend into the Southwest, water will be in extremely short supply There is no known method of estimating future cost-benefit ratio of water in southwestern New Mexico

10 2 Cattle and Harvestible Wildlife Cattle have a tangible value Harvestible wildlife has both a tangible value and a non-tangible value There is a grazing conflict between cattle and elk There is a very minor conflict between cattle, deer and other wildlife. Deer are the No. 1 game animal in New Mexico In 1944 the New Mexico Department of Game and Fish issued 7,000 elk permits, while selling approximately 100,000 big game (deer) licenses Cattle grazing in the Gila National Forest promotes deer turkey and small game reproduction The effects of removing domestic cattle from the old Heart Bar range forced the Game and Fish Department to change from the six weeks, either sex, hunt on the majority of the wilderness to the present short seasons for bucks only

67-5

We agree. We feel that the Plan provides for this improvement.

67-6

All alternatives result in a decrease in soil loss.

67-7

We disagree. The Gila does contain habitat important for the survival of some endangered species.

67-8

We agree that these factors are important.

67-9

As stated in our response to your comment number one, we have reviewed the potential to increase water yield and have found that the costs are too high for the expected increase in water yield that is possible. We agree that water will be in short supply and that there is no way to estimate future cost-benefit ratios of water, but we still feel that it is not appropriate to implement an alternative similar to the Maximize Water Yield Benchmark. Implementation of this type of an alternative would require substantially higher budgets than we could expect to receive in the foreseeable future. It would also limit the ability of the Forest to provide the multiple uses necessary to help resolve issues and concerns.

We agree that decreasing AUM's on lands that have heavy stands of pinyon, juniper, and oak may not be sufficient to improve watershed condition. Many of these acres will require some investment to improve. However, we do not agree that invasion of pinyon-juniper (P-J) and Ponderosa pine accelerates erosion. First, grasslands which are invaded by P-J on Ponderosa pine are usually not the most productive grasslands. Further, we know of no research which would support the conclusion that grass provides better erosion protection than good woodland cover. Ponderosa pine cover, in most cases improves erosion protection.

67-10

Please see our response to your comment number two.

Low-calf grazing on the Gila National Forest always had heavy losses to depredation, in spite of aggressive predator control. Cattle shared depredation with wildlife. Shortly after the Department of Game and Fish purchased the Heart Bar Ranch, all predator control ceased within the Gila Wilderness Area. There was a rapid increase in coyote population with the resulting decline in deer and other harvestable wildlife.

3. Outdoor Recreation "OUTDOOR RECREATION FOR AMERICA-1962", a report to the President of the United States and to Congress by the Outdoor Recreation Review Commission. "Recommendation 13-1. Public agencies should direct particular attention to assure that adequate opportunities for water-based outdoor recreation are accessible to all Americans." This recommendation has not applied in the Gila National Forest and is not considered in the Gila EIS.

A New Mexico Outdoor Recreation Survey listed a different outdoor preference. "Family Group Camping." The Spanish-American culture listed "extended family camping," as top preference.

WYMU 1973 Study, "OUTDOOR RECREATION ACTIVITIES OF SOUTHWEST NEW MEXICO FAMILIES" listed preferred activities in order: fishing, picnicking, hunting, tent camping and car sight-seeing. The most money spent per year was on fishing, tent camping, trailer camping, hunting and golfing. It appears that a final EIS should reflect the shortage of opportunities to participate in preferred activities, and to provide access by motor vehicles to additional streamside areas.

The winter activity area near Signal Peak Turn-off, as listed in the Draft EIS, is an excellent project.

4. Timber, Fuelwood. There are other National Forests that produce lumber and pulp more efficiently than the Gila National Forest. Most of the finished lumber used in this area is freighted in. Therefore, it is not necessary to sacrifice long term benefits from other resources just to increase timber harvest.

Cutting fuelwood from live juniper, pinyon and pine could benefit other natural resources while decreasing erosion.

5. Riparian Habitat. Since 1972 repeated floods have scoured the canyon bottoms throughout the Gila National Forest. The loss of vegetation and of established marshy areas have been particularly harmful to the fisheries and to the non-harvestable wildlife.

Nesting Black Hawks disappeared from most, if not all, of the upper Gila after the 1978 flood. The decline in wintering Bald Eagles can be attributed to shortage of fish, wild ducks and small prey.

67-11

The Forest Service does not authorize predator control. The U.S. Department of Agriculture's Animal and Plant Health Inspection Service, Division of Animal Damage Control is the agency responsible for most predator control. The New Mexico Department of Game and Fish is responsible for predator problems caused by bear and cougar. We will continue to cooperate with those agencies in their efforts to control predators.

67-12

Opportunities to develop additional camping facilities near streams is very limited. Most of the potential locations are within floodplains. Development and maintenance of sites in floodplains would be very expensive.

We disagree, however, that the EIS and Plan do not consider the need to provide adequate opportunities for water-based outdoor recreation. The Plan calls for the maintenance and reconstruction of recreation facilities on the Forest. Many of these facilities are associated with water-based outdoor recreation opportunities. In addition to the maintenance of existing facilities, the Plan directs the construction of a new campground at Quemado Lake. We feel the Plan is responsive to the water-based outdoor recreation need.

67-13

The level of timber harvest has been reduced in the final Plan. Out of the 3.3 million acres on the Forest, approximately 262,000 acres will be managed to sustain timber output. Timber harvest is very important to the community of Reserve. We feel that this level of timber harvest will not result in a sacrifice of long term benefits from other resources.

67-14

We agree.

67-15

We will continue to manage to improve riparian habitat. Additional standards and guidelines have been added to the Forestwide Management Direction section to clarify our management intentions.

LETTER 67

FOREST SERVICE RESPONSE TO LETTER 67

7 Rare and Endangered Species This should not be a concern in the Gila National Forest. It should be unnecessary to include additional acreage into the Wilderness for protection of rare and endangered species. The San Francisco River area is needed for water based family camping and outdoor recreation. The large acreage presently within the Wilderness should be ample to provide protection for non-harvestable wildlife and for the occasional rare and endangered species.

16

The Draft GIS for the Gila National Forest is a comprehensive listing and analysis of natural resources within the National Forest. The concerns are primarily of national origin and do not correctly reflect the concerns or needs of the Southwest.

17

Sincerely,

Doc Campbell
Doc Campbell, Chairman
Forestry Committee

67-16

We disagree that threatened and endangered species protection should not be a concern on the Forest. By law, we have to protect habitat for these species. No additional wilderness is proposed to protect the Forest's threatened and endangered species.

67-17

We disagree that the concerns that are addressed in the Plan are primarily of a national origin. Issues and concerns were gathered locally and regionally as a first step in the planning process. There was a considerable amount of local input into this process. We feel that the issues and concerns address both national and local needs.

LETTER 68

FOREST SERVICE RESPONSE TO LETTER 68



Albuquerque Wildlife Federation
1914 1952 GAME PROTECTIVE ASSN / 1952 1957 ALBUQUERQUE WILDLIFE & CONSERVATION ASSN / 1973 ALBUQUERQUE WILDLIFE FEDERATION
H. ANTONIO VILLALBA, PRESIDENT / J. L. LEE, VICE PRESIDENT / J. L. LEE, SECRETARY
OUR WILDLIFE AND NATURAL RESOURCES / P.O. Box 1234
Albuquerque, New Mexico 87102



October 1, 1985

000 68

RECEIVED
OCT 10 1985

OCT 10 1985

DATE RECEIVED

Forest Service, Forest Supervisor
Santa Fe National Forest
2610 North 5th Street
Santa Fe, New Mexico 87505

Dear Mr. Supervisor:

This letter includes the comments and suggestions of the Albuquerque Wildlife Federation on the Draft Environmental Impact Statement and Proposed Santa Fe National Forest Plan. In quote 1, we believe the plan will be prepared and in command you and your staff for the effort put forth in producing these documents.

We have the following comments and suggestions to make for your consideration in the final Management Plan:

1. Wildlife habitat should be more desirable for fish and wildlife resources on the Santa Fe National Forest. We would prefer it to be used for planning purposes. Less emphasis would be placed on range and timber activities. Improvement of fish and wildlife habitats merits full consideration of this important resource.
2. In the statement on page 10, paragraph that the quantity of wildlife habitat would decline and that the level of coordination and improvements would offset the overall impact on carrying capacity. We believe the quantity of habitat is of fundamental importance to wildlife population and care must be taken when it is reduced.
3. On page 10 under "Produce Timber and Wood Fiber," it is stated that logging activities will result in additional timber on steep slopes that are not presently being logged. Logging operations of 10% or more presents real problems in rock lands where stability of the watersheds in such areas would likely suffer.

68-1

Alternative F has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F. Some adjustments have been made to the Proposed Action Alternative timber program that would affect other resources. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of those changes.

68-2

The statement in the Plan on page 7 reads, "Even though the quantity of habitat declines, the level of coordination and improvements offset the overall impact on carrying capacity." We feel that this is a correct statement. It is true that the acreage of habitats are important, but the relative position of habitats to each other can be as important, if not more important. An example of this situation is found in vast areas (montones) of high seral stage habitats where natural disturbances have not been allowed to occur.

Restoring the relative juxtaposition of habitats in these areas (ie cover types, water, forage, etc.) results in a shift in habitat acreage. A decrease in some of the high seral stage coniferous forest habitats may be expected as a result of these shifts. In this case the acreage of certain high seral habitat types is expected to be reduced somewhat while natural habitat diversity and habitat carrying capacity are maintained or restored. The management activity which enables this restoration to occur is accomplished through levels of wildlife habitat coordination and improvement.

68-3

We agree that logging activities on steep slopes will result in some additional soil loss (as indicated in the Environmental Impact Statement), but this soil loss will not be high enough to reduce long term productivity. Best Management Practices will be used to provide for continued water quality. Cable logging activities actually result in less soil disturbance than tractor logging.

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems was a concern expressed by a number of people. In re-evaluating the Proposed Action Alternative it was determined that the most cost efficient method of obtaining the 30 MMBF objective in the Proposed Action Alternative was to log some portion of the volume from steep slope areas due to the relatively high volumes per acre. Logging steep slope areas in conjunction with less than 40 percent slope areas often results in construction of fewer miles of roads per thousand board feet of volume harvested. In order to respond to the concerns regarding steep slope logging, the economic model was constrained to allocate no more than 5 MMBF from steep slope areas; a level that is 59 percent of the projected level of the original Proposed Action Alternative. The Forest management team feels that the use of cable systems should be pursued. In the long term, cable harvest could result in the construction of less miles of roads and less roading of presently unroaded areas. The use of cable systems on steep slope areas could eventually result in their use on less than 40 percent slope areas. This could have positive environmental benefits.

68-4

We agree that watershed should receive a high priority in the management of the Gila National Forest. We also agree that this is a complex situation.

Most watershed problems on the Forest are a result of natural and man caused activities that have reduced ground cover conditions to a point where the effective cover is below the tolerance level. This situation can sometimes be corrected through watershed restoration projects, but in most cases nature must correct the situation through slow revegetation of the areas. All alternatives in the EIS provide for management activities that, over time, reduce the causes of deteriorated watershed areas, but the natural processes that improve the actual condition may not result in restoring an area to satisfactory condition for a long period of time. We will continue to work toward the restoration of watersheds that are not in satisfactory condition.

68-5

We agree that managing for a diverse, well-distributed pattern of habits for viable wildlife populations and fish species in cooperation with state and other agencies deserves close attention in this Plan.

Between the draft Plan and the final, we meet with the New Mexico Game and Fish Department to coordinate their State Comprehensive Planning effort with the Forest Planning effort. In the process of comparing their goals with our Proposed Action Alternative we found that we were unable to totally meet their goals except for a significant portion of their big game species goals. NMDGF's goals are in draft form and may change, but based on the best information we have it appears we can meet 100 percent of their goals for turkey, bighorn sheep, and prong horn; 75 percent of their goal for deer; and 90 percent of their goal for elk. These are the species that support most of the hunting recreation associated with game animals.

At the time of the coordination meeting, NM game species goals were not available, however, increases identified in the Plan should provide for at least a portion of their goal. Since the Game and Fish Department is a single interest agency [wildlife and fish], it is doubtful that our multiple use objectives will effectively meet 100 percent of their goals. We will, however, continue to coordinate with them and work toward meeting their goal as well as the other multiple use goals of the Forest Plan.

68-6

We agree that nongame wildlife species are important but we feel nongame species were given the proper level of emphasis in the Proposed Action Alternative.

We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous forest habitats are maintained at a level that complements the forage habitats. Game species may appear to be solely emphasized; however, this does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process and nongame species were included in the indicator species selected. Specific management practices for nongame species [the exception is T&E species] are not developed because of the large number of species and the magnitude of information required to track individual species. Effects of management activities on game and nongame indicator species will be monitored.

4. Under "Wild and Water" on page 1, it is stated that 35 percent of the Forest has an unsatisfactory watershed. Every effort must be made to bring this figure down. We realize this is a complex situation. Our desire is that this be given a high priority in the managing of the Gila National Forest.

4

Affiliated With The National Wildlife Federation

5. Under "Wild and Water" and Fish Habitat, the plan contains a goal to develop a well distributed pattern of habitat for wildlife populations and fish. This goal is in line with state and other agencies' desires. Our attention in this plan. This should provide a good foundation of wildlife management in the years to come.

5

6. The emphasis on habitat is to the protection and management of nongame wildlife species. We believe many of these programs will gain importance in future years.

6

68-7

An inventory of undeveloped areas was conducted as a part of the RARE II process. The inventory was used for evaluating areas for potential inclusion in the wilderness system. Those areas selected by congress for wilderness were classified as a result of the New Mexico Wilderness Act. The Act also required further study of some areas. There are two wilderness study areas on the Forest, the Lower San Francisco River and Hells Hole. The non-selected areas were released for multiple use management. Approximately 699,000 acres of undeveloped area currently exists on the Forest [including the two wilderness study areas]. In the first decade the Proposed Action Alternative will result in the development of approximately 20,600 acres (3 percent) of the 699,000 undeveloped acres on the Forest. The areas not proposed for development as part of the planning process [including the Wilderness Study Areas] will be managed to maintain their semi-primitive recreation opportunities. Over 97 percent of the undeveloped area on the Forest will still be undeveloped when the Plan is redone in 10-15 years, and will be reconsidered for wilderness designation at that time.

68-8

We agree that improvement of riparian habitats is extremely important. To clarify our management objectives, the following standards and guidelines have been added to the Forestwide Standards and Guidelines.

Where possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted to provide for the protection of these key areas.

Grazing in riparian zones will be managed to provide for maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to these standards and guidelines, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These standards and guidelines give some specific long term goals for riparian condition.

The changes in the Proposed Action Alternative are expected to result in improvement in riparian habitat condition over time. The Chapter 4 section of the Environmental Impact Statement has been written to better address the differences to the effects the various alternatives will have on riparian habitats. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

A. The proposed National Forest Plan states that riparian sites for the most part are presently in unsatisfactory condition. It furthermore states that in the 5 periods there will be little change in their condition. No better action must be taken to provide greater riparian benefit to the riparian sites. The fish habitat projects which result from unsatisfactory riparian condition are an indication for definite improvement. There are of course many other resources that are benefited by rehabilitating riparian areas.

7

8

We appreciate the opportunity to review these documents. Thank you for making them available for our comments.

Sincerely,



Bob Nordstrom
President

LETTER 69

FOREST SERVICE RESPONSE TO LETTER 69

000 69

Mr. Stewart
Chairman
New Mexico Wilderness
Study Committee
1004 Fairview, NW
Albuquerque, NM 87105
October 5, 1985

Mr. Kenneth S. Ogden
Forest Supervisor
Gila National Forest
2610 West 5th Avenue
Silver City, NM 88531

Mr. Scripps

I am concerned about the proposed Gila National Forest
Plan and DEIS. The Wilderness Study
Committee, in addition to the planning comments made here,
we agree with the plan as outlined by the El Paso Group
of the Sierra Club and by the Grand Chapter of the
Sierra Club.

We are struck immediately by the fact that you
preferred alternative C not the one which returns the
greatest total benefit. According to table 4, p. 14 of the
summary, alternative F will return over two million dollars
more over a fifty year period. Not only does Alternative F
return the most dollars but it appears to be the most
responsible of the considered alternatives in terms of
environmental protection.

Table 5 of the summary indicates that Alternative F
has the highest present value of benefits of any
alternative and its present value of costs is 17 million
dollars less than the present value of Alternative C.

If I interpret the language of the report correctly,
the benefits of Alternative C were somehow discounted
because the would be predominantly intangible benefits
such as wildlife habitat and diversity (to which you have,
nonetheless, assigned a monetary value but then discounted
because it wasn't in dollars anyway). Granted you have a
difficult task in weighting intangibles such as flowers
against board feet of lumber, but I would be more
sympathetic if your methods were made clear in the DEIS.
As the project proceeds, would the dollar comparison at
face value and would you have not selected the
alternative which combines both economics and environmental
protection?

None of the alternatives adequately address
wilderness. Of course, we support wilderness designation
for the areas considered, Hils Hole and the Lower San
Francisco River but what of the thousands of acres of de
facto wilderness which still exist in the Gila? The
documents should at least identify the BORE II study areas

and then identify the areas which are
not designated as wilderness. The areas which are
not designated as wilderness are the areas which are
not designated as wilderness.

Under the proposed plan, the areas which are
not designated as wilderness are the areas which are
not designated as wilderness. The areas which are
not designated as wilderness are the areas which are
not designated as wilderness.

Under the proposed plan, the areas which are
not designated as wilderness are the areas which are
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not designated as wilderness are the areas which are
not designated as wilderness.

69-1

Alternative F, as stated, has the highest PNV, benefits, and B/C ratio;
however, this alternative fails to address the issues of producing wood
fiber, managing and utilizing range resources, and improving range grazing.
Alternative F is the most successful at addressing the amenity types of
concerns on the Forest (plant diversity, wilderness, wildlife habitat,
etc.); however, the revised Proposed Action Alternative addresses both the
amenity and commodity issues identified at the start of the planning process
and provides the best balance of outputs, both commodity and amenity, within
the identified budget limits. We feel that the modified Proposed Action
Alternative provides better overall net public benefits than Alternative F.

69-2

The section of the EIS that addresses resolution of issues provides an
indication of how well each alternative resolves issues. If you examine
this section in the draft or the final Environmental Impact Statement, you
will find that Alternative F is not very successful at resolving some of the
Forest issues. This is the primary reason it was not chosen. A more
complete rationale for the choice of the Proposed Action Alternative has
also been included in the Record of Decision that accompanies the final
Environmental Impact Statement.

69-3

We have included an analysis of effects on unroaded areas in the final
Environmental Impact Statement. Because of the changes made to the Proposed
Action Alternative, 97 percent of the unroaded acreage will remain unroaded
for the first decade. (Our rationale for not recommending the wilderness
study areas for wilderness, along with a discussion of the undeveloped
areas, is included in the Proposed Action Alternative Summary of Changes
located in the beginning of this document).

69-4

The terms to which you refer describe the types of recreation opportunities
that are available within the wilderness. The glossary contains a
definition of the terms. Within wilderness, the difference in the
opportunities is due primarily to the relative isolation from man-made
modifications and from sites and sounds of man.

68-5

Timber demand was not determined by asking the timber industry. The Forest approach was to examine the historic pattern of sales. The future need figures used in the draft Environmental Impact Statement were based on the timber sold between 1971 and 1980. The data used for this projection is displayed in the draft Environmental Impact Statement in Table 21. Table 21 was also intended to show the timber sold in 1981 through 1984 and the average volume sold during the 14 year period. During the public involvement period, we discovered that the information for the last 4 years in the table was timber offered, not timber sold. This table has been corrected and a new average has been calculated based on the corrected information for 10 to 15 years. This average is considered to be the demand in the first decade. The existing mill capacity is above this figure. Considering the existing mill capacity and the volumes that have been sold in years when the economy was strong, we have now projected the long term demand level to be approximately 30 MMBF. The timber issue discussion has been modified to reflect this level. The Proposed Action Alternative has been modified and has an allowable sale quantity equal to the average volume sold in the last 10 to 15 years.

As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber contractors or any other interest group as being the sole recipients of a federal subsidy. Practically speaking, a subsidy

exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who may receive benefits in excess of costs.

68-6

The Plan gives a clear picture of the joint costs and benefits of management activities. It is not accurate to single out individual resource costs and assign single benefits to those costs. No single cost results in a single benefit. As an example, costs that are called timber costs are used to plan and administer timber sales. In the project planning phase of a timber sale, integrated stand management techniques are used to insure that diversity of wildlife habitats is maintained or increased. The timber harvest activities open up some stands which provide for additional wildlife forage. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this, even though wildlife receives some benefit, are classified as timber funds in the Plan. There is no way to split out the portion that benefits wildlife and the portion spent solely to produce timber outputs. As a result of this joint production situation, all costs must be considered in relation to all outputs.

LETTER 69

FOREST SERVICE RESPONSE TO LETTER 69

ENVIRONMENTAL CONSEQUENCES

11111111

69-7

The environmental impacts analysis documented in the Plan is designed to indicate the effect that each alternative will have on the various resources, uses, and environmental characteristics of the Forest. We feel that this is the proper approach to take in a programmatic environmental statement. If we had documented the effects of each management activity in each alternative for the various resources, uses, and environmental characteristics, the document would have been considerably longer and more complicated; a concern expressed by many commentators.

We disagree that there is no discussion of environmental impacts of harvesting timber as it relates to wildlife habitat, etc. The environmental consequences section on wildlife defines the effects of the alternatives on wildlife habitat and explains how timber activities affect these habitats. The same is true in the diversity section, the soil section, etc.

We agree that the Environmental Impact Statement should be a cause and effect study and we feel that we have accomplished this. The cause is the management practices used in a particular alternative. The effect is the effect on the various resources. The environmental consequences section explains the effects of the various alternatives on the timber resource, the range resource, the wildlife resource, the soil resource, diversity, etc. Within each individual resource section, the primary management activities that will cause the effects are explained.

You seem to have a particular concern about steep slope logging. Our response to a number of concerns related to steep slope logging is included with the El Paso Group Sierra Club comments. Please refer to this comment (comment #11).

69-8

Closing areas on the forest to ORV use when no resource or management problem exists would be the equivalent to closing areas to hiking or any other use when there is no resource or management problem. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the forest resources while providing as much freedom to forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require closures, *specific areas will be closed.*

Some of the road construction and reconstruction
 since 1945 has been done by the Forest Service
 and some by the State of New Mexico. The Forest Service
 has been responsible for the majority of the road
 construction and reconstruction since 1945. The
 State of New Mexico has been responsible for the
 majority of the road construction and reconstruction
 since 1945. The Forest Service has been responsible
 for the majority of the road construction and
 reconstruction since 1945. The State of New Mexico
 has been responsible for the majority of the road
 construction and reconstruction since 1945.

9

10

69-9

Your concern on road construction seems to be very similar to the concern expressed by the El Paso Sierra Club. Please see our responses to their concerns on road building and on below cost timber sales [response to letter #11].

69-10

All roads that we are reconstructing are roads that are visible on the landscape. Approximately 95 percent of these roads are presently passable with vehicles.

[Handwritten signature]

Director, Forest Service, New Mexico

LETTER 70

FOREST SERVICE RESPONSE TO LETTER 70

10-7 85

To Forest Supervisor

U.S. NATIONAL FOREST
104 P. H. 12

OCT 08 '85 000 70

DATE REC'D

This is to inform you that

another citizen is in favor of the views

held by the Sierra Club in regards to the

Gila National Forest Draft Plan and the resulting

Forest Management Plan. I have enclosed this as

a reminder. Thank you

Sincerely, Linde-Sonals
133 Lousiana St.
Alb. N.H.
571-

70-1

Thank you for your comment. The response to the Sierra Club's concerns can be found adjacent to letter number 11.

- Alternative F (the environmentally kind and economically best alternative) was not selected
- The two Wilderness Study Areas (W.S.A.) were not recommended for wilderness recommendation.
- Roadless areas were not considered for future wilderness in terms of interim protection
- The emphasis seems to be on expanding logging and includes the necessary road building and the harvesting of timber from steep slopes to effect this expansion.
- Non-game wildlife protection seems glossed
- Many of the management details are vague and need clarification.

LETTER 71

FOREST SERVICE RESPONSE TO LETTER 71

000 71

000 71

30 SEPTEMBER 1985

Forest Service
Gila National Forest
2614 North Mill St.
Silver City, NM 86061

Dear Sir:

I am writing this letter both as a concerned citizen and as a retiring Army officer.

You have before you now a draft Plan on the environmental impact of proposed uses of lands within the Gila National Forest. The fact that the deadline for comment has been extended speaks for the importance of the Plan and the necessity for waiting until all the facts are in before making any decision in the matter.

As public officials I am sure that you take your responsibilities very seriously. As an Army Officer I can assure you that I take my responsibilities as a citizen very seriously also.

I am retiring soon after twenty years of service with the United States Army and will begin my retirement in the El Paso area. After three separate assignments to the El Paso southwest totalling more than five years I feel right at home there. During my assignments I have travelled extensively in the southwest and am very familiar with the Gila National Forest. I feel therefore a right to speak on this matter.

The most favorable option economically and environmentally was not chosen (Alternative F). Why? In an age where government dollars are rare and every agency is facing cutbacks (not to mention veteran's retirement benefits) why would not the most cost effective Plan be high on anyone's priority list?

Interim protection for existing roadless areas was not considered. Again, why? I realize the necessity of developing a Plan for multi-use of public lands for every one - 4 wheel, 2 wheel, 4 legged and 2 legged users, but why not protect these areas until that Plan is defined?

Wildlife protection must be considered in all phases of land use plans. Any Plan that will not safeguard existing wildlife, whether game or non game, will surely have an adverse effect on the environment in question. There is no way to discuss rationally the changing of only one part of a complicated ecosystem such as the southwest has to offer.

71-1

Alternative F has the highest PMV, benefits, and B/C ratio, however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

71-2

Of the approximately 699,000 undeveloped acres outside of the classified wildernesses, approximately 21,000 acres will be effected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. The remaining 678,000 acres will be managed to maintain their semi-primitive recreation opportunities. This means that only 3 percent of the existing unroaded area on the Forest will be developed during the life of the Plan. Please refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the undeveloped areas on the Forest as they are affected by the modified Proposed Action Alternative.

71-3

We feel that we have provided for a variety of both game and nongame wildlife habitats in the Proposed Action Alternative. Available forage for wildlife, for example, increases over time. Coniferous forest habitats are maintained at a level that complements the forage habitats. Although game species may appear to be solely emphasized, this does not mean that nongame species were ignored or that habitat requirements for these species will not be considered during management activities. Habitats for indicator species were included in the allocation process. Nongame species were included in the indicator species selected. Specific management practices for nongame species (the exception is T&E species) are not developed because of the large number of species and the magnitude of information that would be needed to track individual species. Effects of management activities on game and nongame indicator species will be monitored.

71-4

In your letter you mention a concern relating to the effects of timber activities, on other resources.

It is true that timber activities will result in additional soil loss. This soil loss, however, will be minimized through the use of Best Management Practices (practices designed to minimize the effects of nonpoint pollution, in this case sediment, sources.) This will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long term productivity.

The modified Proposed Action Alternative results in an improvement of wildlife outputs over time. Many of the game species benefit from the type of management practices conducted within timber sale areas. Through integrated stand management, diversity of age classes will be increased which is a benefit to many types of wildlife. If the management direction started in the first decade were continued for 50 years, the modified Proposed Action Alternative would only result in a long term reduction in old growth habitat of 12 percent. This should provide substantial amounts of habitat for wildlife that require high seral stage timber areas.

Since sediment from timber areas will be controlled and the overall soil loss from the Forest will be reduced over time, water quality should

generally not decrease. Water yield will continue to decrease somewhat (not a significant amount) because timber is growing faster than it is being harvested. As the square feet of growing stock (trees) increases, the water yield decreases. Without timber harvest activities or some other activity that would reduce the growing stock, water yield would continue to go down. Thus, timber harvest will actually increase the region's water supply rather than reduce that supply.

Of the three and one-half million acres within the Gila National Forest, only 72,000 acres are required to support the 30 MMBF sawing harvest recommended in the modified Proposed Action Alternative. The proposed Forest Plan contains standards and guidelines pertaining to the visual quality of the various analysis areas which will protect the scenic attractiveness during the implementation of any resource activity.

Logging and minerals are a vital part of the economy of the Gila area. I caution you to keep an open mind as well as open eyes while developing a plan as complicated as the area it will serve. Expanded logging may improve the economy for now but how much damage will it cause and how much will it cost to repair after the logging is done? In terms of lost jobs when the environment can no longer support logging? In terms of dollars when the erosion and water sheds become upfront problems in the future? In terms of lost revenue from lack of tourist and recreational users of the area when it no longer becomes attractive or usable?

Any plan must accommodate everyone and no one is going to be happy with everything in the Plan. I charge you to remember your responsibilities to the people as land managers and pick the very best plan that will accommodate the very highest numbers of people and leave the on argument in fact for future uses. A careful balance must be struck between the commercial users of the lands and the economic realities of abusing the environment.

Thank you for your time and I hope that a sound decision will be made on the facts and not a emotional one based on expedient dollar issues.

Sincerely,

H. W. Sparks

H. W. Sparks
R112, USA
547th Ord Co
APO NY 09702-2532

LETTER 72

FOREST SERVICE RESPONSE TO LETTER 72

72-1

Timber companies do not obtain sawlog material by leasing the land. Professional foresters determine which areas are to be harvested. Once an area is identified for harvest, it is subjected to a silvicultural examination to determine the prescription under which the material will be removed. The material to be removed is then designated on the ground and the volume to be removed is determined. The minimum value that will be accepted is then determined through the Forest Service appraisal process. This process takes into account the costs that are associated with felling, bucking, skidding, loading, hauling, and milling the timber. In addition the costs of road construction, road maintenance, road surface replacement costs, erosion control costs and slash disposal costs are taken into account. Once the minimum acceptable value is determined, the timber is advertised for sale. Final value is determined through an oral bidding process. Thus, timber is sold at the current market price.

As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber contractors or any other interest group as being the sole recipients of a federal subsidy. Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

72-2

Fees charged for green personal use fuelwood have increased more than 250 percent over the last three years on the higher use portions of the Forest. This has been done to reduce demand on areas that have historically been the heaviest used fuelwood areas of the Forest. In addition, the fee increase was designed to encourage users to other less used parts of the Forest. Price differences between species has also been used to encourage cutting of less popular species. Commercial sales have been eliminated on the heavily used portions of the Forest. We will continue to use price differentials as one management tool to regulate fuelwood outputs.

72-3

In reviewing the Draft Environmental Statement, we cannot find where it illustrates that soil loss under the Proposed Action Alternative and Alternative F are equal. The figures actually show that Alternative F produces less soil loss than the Proposed Action Alternative. In response to public comment, we have developed a modified Proposed Action Alternative with several significant changes, including a reduction in projected soil loss.

72-4

We have re-evaluated our recommendation on the two Wilderness Study Areas and continue to support the non-wilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000 72

Matthew Managie
1610 High Street
Las Cruces, New Mexico 88001

4 October, 1985

Dear Sir,

I have just read the Gila Forest Plan and would like to make some comments on it. The forest plan has many segments that I do not support. I believe the draft plan should be modified.

First, the government should not subsidize timber production by leasing land at less than its current market price. The land to be harvested should be leased at current market value. Furthermore, the Forest Service should require all companies that wish to harvest in the Gila to include road building and reclamation costs into all their bids for land. Only when all costs have been included can true economic analysis of timber production ensue.

Second, fuelwood should not be maintained as a competitive fuel source by excluding management and other costs. Fuelwood cutting, like timber, should reflect true market value. Increasing supply, at below a market price, subsidizes wood as a fuel source for household heating. People should heat their homes with fuels which reflect environmental costs of use.

Third, the issue of wood cutting brings me to an apparent discrepancy in the Environmental Impact Statement. The impact statement says that with a yield of 64.9 million board feet in a timber intensive program, there will be a soil loss of 18.5 million tons. The statement also says that in a wilderness intensive program there will be 18.5 million tons of soil loss. I would appreciate if you could clarify how it is possible to cut tremendous amounts of steep slope timber without markedly increasing the soil erosion compared to a wilderness intensive program.

I would also like Hell's Hole and the lower San Francisco areas to be designated as wilderness areas.

I welcome any comments you might have and I would like to thank you for taking the time to listen to my viewpoint.

Sincerely Yours,

Matthew Managie

LETTER 73

COLLEGE OF ARTS AND SCIENCES

DEPARTMENT OF BIOLOGY
Box 1A7/1 Las Cruces, New Mexico 88003
Telephone (505) 646-3611



Mr. Kenneth C. Scoggin, Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000 73

Mr. Scoggin

I appreciate this chance to comment on the Draft Environmental Impact Statement for the Gila National Forest Proposed Plan. I wish to compliment you for responding to the multiple needs expressed by people in Southwestern New Mexico, and attempting to incorporate these diverse, and often conflicting needs into a long term plan for the Gila National Forest. However, while reviewing the Draft Environmental Impact Statement I noticed two apparently severe deficiencies with the Proposed Action Alternative.

First, throughout the FIS you stress the importance of both the protection of soil and watershed resources, as well as riparian habitat. Riparian habitats, while comprising a minor area of the total forest, represent critical areas, not only for watershed protection, but for wildlife, recreation, and domestic livestock. While this is directly stated in the Draft FIS, I do not believe that the Proposed Action Alternative resolves the conflict between timber harvesting and the protection of soil resources, watershed resources and riparian habitat. Furthermore, this conflict has not been adequately addressed in the FIS.

(1) In several tables throughout the Summary you show essentially similar effects on (A) water yield, (B) watershed condition, and (C) soil loss for all management alternatives even though timber harvests range from 48.4 MMBF to 24.8 MMBF across all alternatives. Furthermore, you state that the differences in timber yield will primarily be due to logging of steep slopes which have been protected in the past. I maintain that logging of steep slopes, as indicated in the Proposed Action Alternative will result in increased sediment yields, increased runoff following intense summer thunderstorms, and initiation of broad scale gullying and sheet erosion which will eventually result in permanent losses of soil resources and irreparable damage to both entire watersheds and riparian habitats.

(2) On page 39 you indicate that road construction and poor road maintenance are one of three primary

causes of soil erosion. Yet your Proposed Action Alternative will result in more road construction to support timber harvest with a total of 215 total miles not maintained to standard by period 5. This appears to be a direct conflict between short term timber yields and long term productivity, and proof of this is offered on page 39 where you state that the Proposed Action Alternative will result in the level reduction of soil loss.

FOREST SERVICE RESPONSE TO LETTER 73

73-1

We disagree that the Proposed Action Alternative in the draft Environmental Impact Statement did not provide for the protection of soil resources, watershed resources and riparian habitat associated with timber activities. Protection of the soil resources is accomplished by mitigation measures included in timber sale contracts and through the use of Best Management Practices. These practices insure that site productivity is not reduced and that watershed values are protected. Through these mitigation measures and through standards and guidelines included in the Plan, Plan director will protect the productivity and diversity of riparian habitats.

We need to note here, however, that because of the public concerns expressed regarding the level of timber harvest in the original Proposed Action Alternative, the level has been reduced. The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade, and was projected to increase to approximately 48 MMBF by the fifth decade. The benefit values and projected future need figures have been modified to a level of approximately 30 MMBF per year for the first decade, and is projected to stay relatively constant over time.

73-2

The reason that the factors that you mention do not change more is because of the limited extent of timber activities on the Forest compared to other activities. Even in the original Proposed Action Alternative, timber activities would only take place on approximately 432,000 acres by the end of the fifth decade. This is approximately 12 percent of the Forest. Since grazing use of the Forest is much more extensive, continued improvement in the range resource is a much larger contributor to the reduction in total soil loss and improvement in watershed condition.

Even though total soil loss is reduced over time, soil loss in individual areas does increase as a result of timber activities. As mentioned in our response to your comment number 1, however, management activities are used to control the soil loss to ensure that soil loss will not reduce site productivity. Changes in the Proposed Action Alternative has reduced the projected soil loss from timber activities from 634,000 tons per year to 477,000 tons per year.

Like soil loss, water yield increase is small because of the large acreage on the Forest that is not affected by timber activities and because the effects on water yield are reduced over time as trees grow to occupy the space left by those harvested.

73-3

Cable logging activities result in less soil disturbance than tractor logging. Timber harvesting activities will result in some additional soil loss (as indicated in the Environmental Impact Statement), but this soil loss will not be high enough to reduce long term productivity. Some increase in water yield will occur but it will not cause the devastating results that you indicate. In the modified Proposed Action Alternative, only approximately 900 steep slope acres would be harvested annually during the first decade.

73-4

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Changes in timber harvest were indicated in our response to your comment number 1. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads. This is a 57 percent reduction in projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade.

Approximately 65 percent of these roads would be closed after timber activities are completed.

73-5

In the final Plan the following Forestwide Standards and Guidelines have been added to clarify our management direction regarding riparian habitat protection.

Where possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted to provide for the protection of these key areas.

Grazing in riparian zones will be managed to provide maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserted the standards and guidelines from that document. These standards and guidelines give some specific long term goals concerning riparian condition.

The changes in the Proposed Action Alternative are expected to result in an increase in riparian habitat condition over time but the increase will still not be attained as soon as it would be if Alternative F were implemented. Due to the multiple use goals in the Proposed Action Alternative and the associated budget constraints, it is not possible to attain those accelerated levels of riparian management. Riparian condition is a major concern on the Forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

73-6

The reason that we do not mention any irreversible biological consequences associated with not recommending either the Gila or San Francisco Rivers for Wild and Scenic River classification, or the two Wilderness Study Areas within the Forest for wilderness is that there are none. Biological irreversibility would require the eventual extinction of a plant or animal species. There are no activities planned along these rivers that would substantially change their character; and the wilderness study areas will be managed to maintain semi-primitive recreation opportunities.

73-7

We disagree that there is will not be sufficient unmodified habitat on the Forest to prevent irreversible changes to the indicator species habitat. First, the Gila National Forest already has over 750,000 acres of classified wilderness. In addition to the classified wilderness, the Forest contains 699,000 acres that are presently unroaded. The original Proposed Action Alternative would have resulted in logging approximately 34,000 acres of this unroaded area in the first decade. The modified Proposed action only results in development of approximately 21,000 acres. A continuation of the timber activity planned in the modified Proposed Action Alternative would result in a 50 year reduction of only 12 percent in old growth habitat. We feel that this small reduction in unroaded acres and habitats will not result in irreversible changes in habitats.

3) On page 11 of the FE summary you evaluate the effect of the management alternatives on riparian habitats. Why, after identifying these habitats as perhaps the most critical of any single habitat on the Gila National Forest, does the Proposed Action Alternative result in such minor gains in riparian habitat condition?

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In reply to the FE summary, you do not identify the irreversible biological consequences associated with not recommending either the Gila or San Francisco Rivers for protection under the Wild and Scenic River Program. This also holds true for the two Wilderness Study Areas within the Gila National Forest. The protection of large areas of essentially wild habitat is a critical concern given projected growth levels and increased human impacts in the Southwest. While you have identified 25 management indicator species in an effort to monitor habitat changes within the 300,000-acre Forest you have not made sufficient provision to prevent irreversible changes in these habitats, and until the 100,000-acre designated wilderness and Wild and Scenic Rivers are the only alternative.

LETTER 73

FOREST SERVICE RESPONSE TO LETTER 73

In summary, I feel that conflict between logging and long term resource preservation must be re-evaluated, giving special attention to proposed logging of steep slopes and major road construction. Also any proposed action must include a recommendation to include both Olds Hole and the lower San Francisco River in the Wilderness System and to include both the Old and San Francisco Rivers in the Wild and Scenic Rivers Program. Until these issues are addressed I am unable to support the Proposed Action Alternative.

Sincerely,

Steven B. Hendricks

73-8

We feel that many of your concerns have been addressed in the revised Proposed Action Alternative. Please review our summary of these changes contained at the beginning of this public response document. This summary also contains our rationale for continuing our non-wilderness recommendation on the two wilderness study areas and the nonclassification recommendation for the two candidate wild and scenic rivers.

LETTER 74

FOREST SERVICE RESPONSE TO LETTER 74

October 6, 1985

000 74

Southwest New Mexico Group, Sierra Club
1101 3rd St
Las Cruces, New Mexico 88005

Dr. Kenneth C. Scofield
Forest Supervisor
Gila National Forest
2610 E. Silver St
Silver City, NM 88061

Dear Mr. Scofield:

We support the comments submitted and submitted by the El Paso Regional Group of the Sierra Club. People in the Las Cruces area and the Southwest New Mexico Group are also very concerned about the future of the Gila National Forest and the comments represent their views. As your representatives discovered when they visited us to present the Plan, the general public was shocked to find that the taxpayers are subsidizing the timber industry at this time of huge national debt and borrowing. One person commented to the effect that he had been under the delusion that private industry was responsible for its own risks and profits. We again thank Gerry Doyle and John Baldwin for coming to Las Cruces on August 27 to present a program on the Gila National Forest and Proposed Plan and fielding our questions. They were most helpful and cooperative.

General Comment

The whole plan is based on unrealistic forest production goals and exhibits a basic lack of concern for the forest ecosystems. The premise that there is a need for more commercial timber than can be supplied by conventional logging methods is not substantiated by price and demand. The fact that the taxpayers are subsidizing the timber industry is documented by the CHEC Review prepared by Randall O'Toole and U.S. Forest Service statistics (Table 1, El Paso Group comments). Since their comments have covered this subject so well, we will not repeat but would like to emphasize one aspect they did not touch--the importance of the amenity values to tourism as the future economic base of the State of New Mexico. The emphasis must be changed from production of commodities which are economically unfeasible to the wiser long-run goals of New Mexico. The amenity values (wilderness, recreation, wildlife) are the greatest asset New Mexico has and as our economic base slowly changes will be generally recognized as such, hopefully sooner rather than later. If we continue destroying these values for short-term consumptive goals we are cutting our own throats. The National Forest goals and budget need to be adjusted in terms of what is realistic for each region. O'Toole states, "While the Plan proposes huge expenditures for timber and grazing projects of dubious value, the proposed budget for recreation and wildlife is modest" (p. 10).

Timber

O'Toole's recommendations (summary p. 12) to make timber harvest more economically sound make sense. Subsidies will increase as the more remote areas are accessed to maintain the timber targets. In particular we object to the increased

74-1

Please see our response to the CHEC comments.

74-2

We agree that amenity values are important to the future economic base of New Mexico, but we do not think that commodity outputs have to be eliminated to maintain them. Because of public concerns that we received, we have made several changes to the Proposed Action Alternative. We feel that these changes help resolve some of your concerns for the protection of amenity values and provide for balanced use of the Forest's resources. A summary of these changes are located in the beginning of this document. We have also included an explanation of some of these with your specific comments below.

74-3

In several places in your response you state that timber activities on the Forest are being subsidized. As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber contractors or any other interest group as being the sole recipients of a federal subsidy. Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

We also disagree with your statement that subsidies will increase as the more remote areas are accessed to maintain the timber targets. This statement is much too broad to be factual. There are certainly remote areas of the Forest that will be expensive to manage, but there are also areas where volumes per acre are high and management will be very cost effective.

74-4

In response to public comment, the Plan has been adjusted to reflect less timber harvest. Please refer the Proposed Action Change Summary at the beginning of this document for more details concerning the revised timber program.

As indicated in the summary of changes, the steep slope volume and the portion of volume coming from steep slope areas has also been changed. The amount logged in the first decade has been lowered from 8.5 MMBF per year to 5 MMBF per year, approximately one sixth of the total volume and is about 59 percent of the volume logged with cable systems in the original Proposed Action Alternative.

The 5 MMBF level of cable volume was determined using the following rationale. We first tested the economical efficiency of logging cable areas and non-cable areas. We found that with the Forest providing 30 MMBF of sawtimber in the first decade and with the new timber benefit values used in the final Environmental Impact Statement, there are some areas on the Forest where cable logging did not provide benefits commensurate with cost. However, we also found that combining cable logging with tractor logging in other areas resulted in higher net benefits than would have been realized with only tractor yarding. Given a choice, the economic model would have actually allocated a higher percentage of cable volume in the first decade than the volume in the final Plan. This is because of the relatively high volume per acre on some of the steep slope portions of the Forest. These results are consistent with experience on other forests in New Mexico. There appears to be a common assumption that cable logging is inherently uneconomical. This assumption has been apparent in reviews of New Mexico Forests by CHEC. However, review of specific timber sales has shown the assumption to be incorrect. The economics, as well as other potential benefits of cable logging, need to be examined on a specific case-by-case basis. [A more detailed explanation is included with the response to the CHEC comments.]

Considering the concern by your organization and others for steep slope logging on the Gila and the fact that the timber industry has made a financial commitment to log such areas [through the purchase of equipment], we felt that a constrained level of 5 MMBF logged per year with cable systems was a good compromise level. This level also considered your concern for acres logged. Since the volume of timber that can be logged is higher per acre on the cable areas, less acreage are required when compared to comparable volume taken from non-steep slope areas. Forest personnel analyzed the effects of logging only 0 to 40 percent slopes and found that a volume similar to that in the Proposed Action Alternative (30 MMBF) could be sustained. To do this, however, all 0 to 40 percent timber would have to be managed in all of the Logical Timber Management Areas on the Forest. This is not appropriate and would not be responsive to your concern related to entering presently undeveloped areas. Logging some cable volume results in less acres being logged in the first decade and more area remaining unharvested.

You also had a concern about the amount of erosion associated with steep slope logging. We agree that acres logged must be physically suitable without irreversible resource damage. We have re-evaluated the steep slope areas that would be logged and can assure you that irreversible resource damage will not occur. Cable logging activities result in less soil disturbance than tractor logging. This activity will result in some additional soil loss (as indicated in the Environmental Impact Statement), but this soil loss will not be high enough to reduce long term productivity.

volume obtained by cable steep slope cutting. In the Proposed Alternative
 1. 1/3 of 35 MMBF are to be cut using cable logging. Besides being more
 costly to cut, the net economic benefits are a net loss to the Forest and the
 success of the program. Areas in the past have been cut with
 out cable logging and the results are not as good. It is not possible to cut at an unacceptably rate
 or irreversibly damage the Forest. Our Group is involved in replanting pine
 on a burned area. The area is a large area of the Forest which is largely
 unsuitable because the rain didn't come at the normal time. Replanting in
 this climate is a very tedious, long process. Consultants must be put in
 Has this been done successfully on the Gila? It is obvious that logging these
 steep areas is not going to be worth the trouble it causes. If the areas
 are needed to meet production goals, then the cable are out-of-line

4

In response to your concern regarding regeneration, if we did not think that we could reasonably expect regeneration within five years after final removal, we would not have classified steep slope areas as tentatively suitable. There is one major difference between the situation you describe on the Lincoln National Forest and the situation that results from timber sale activities. On the Lincoln, the area was denuded as a result of fire. This resulted in a significant change in the micro-climate. Sites that will be logged will be logged using shelterwood harvest systems. The site will be protected by the trees that remain. Much of the regeneration will be natural regeneration. Regenerated trees have much higher rates of survival in timber harvest areas.

74-5

The National Forest Management Act regulations (36CFR 219.14) state that "during the planning process lands which are not suited for timber production shall be identified ...". In compliance with the regulations, when plans are redone in 10 to 15 years, it is our interpretation that we are required to re-evaluate suitable and unsuitable areas.

74-6

Because of the costs involved in road building, more accessible fuelwood will be utilized first. Because of the high demand for fuelwood, however,

we feel that the level of production in the Proposed Action Alternative is appropriate.

74-7

As a result of changes made in the timber allowable sale quantity in the modified Proposed Action Alternative, road construction projections have also been reduced from approximately 1450 miles of roads over 50 years to approximately 630 miles of roads. This is a 57 percent reduction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed.

You ask why construct these roads when as O'Tool says, "it is difficult to justify road construction in roadless timber lands at today's timber prices." First it is important to note that not all roads are built into roadless areas. Many roads are constructed into areas that have been logged in the past but were not located in the environmentally or economically best places. Often, these roads replace others that already exist.

Second, timber roads cannot be evaluated simply in terms of the short term benefits associated with a single timber harvest operation. In the long term, the roads will be used for many entries into a particular area. Using the shelterwood management system, these roads could be used for timber activities approximately every 20 years. Many will not be kept open during this total period, but reopening them will be relatively inexpensive compared to initial construction. Thus, the cost cannot be evaluated only against a single timber operation.

like to see suitable timber lands reviewed every 10 years as well as unsuitable. We would
Fuelwood
 Extending access to the more remote part of the forest for fuelwood cutting is not the answer that will be even more difficult to control
Roads
 New roads will have a negative impact on fish and wildlife habitat, watershed values and back country recreation even with closing those not needed after timbering. Just the building of them causes problems. Roads are a primary cause of erosion, degrade water quality, disrupt migrations of wildlife, and increase the danger of man-caused fires. Increasing access to the forest will create more "opportunities" for off road vehicle damage and poaching, increasing law enforcement problems. Since these destructive new roads are being constructed for timber company access for which the public is losing money, why do it? O'Tool says, (p. 10) "it is difficult to justify road construction in roadless timber lands at today's timber prices." Funds could be better spent for maintenance of existing roads which will increase safety.

74-8

We have re-evaluated our draft recommendation on the two wilderness study areas and continue to support the non-wilderness recommendation. Please refer to the Wilderness Study Area section of the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

We also disagree that the Gila and San Francisco Rivers should be classified under the Wild and Scenic River Act. The eligible portions of the San Francisco and Gila Rivers, as detailed in Table 35 and 36 of the draft Environmental Impact Statement for the Gila Forest Plan, were evaluated to determine if they possessed the outstandingly remarkable scenic, recreation, geologic, fish and wildlife, historic, cultural, or other similar values as identified in Section 1(b) of the Wild and Scenic Rivers Act as amended thereto. Again, refer to the Proposed Action Changes Summary at the beginning of this document for a more detailed discussion of this recommendation.

74-9

You challenge the statement that the San Francisco River canyon provides a unique opportunity for this type of use, but you do not give any examples of other areas where this type of activity can occur. We can assure you that there are no other areas on the Forest that offer this unique ORV opportunity.

You also object to the year around opening of the canyon. The seasonal closure on the San Francisco River was primarily to protect nesting Black Hawks in the area. The closure applied not only to ORV use of the canyon but to all unauthorized entry, including recreational hiking. Since the closure

Wilderness

We protest the decision in the Proposed Alternative not to add Hell's Hole and the Lower San Francisco River to the National Wilderness Preservation System nor to recommend the portions qualified of the San Francisco and Gila Rivers to Wild and Scenic classification. This land is worth far more preserved in its pristine, natural state than it would be used for short-term monetary gain or ephemeral pursuits. Hell's Hole is a wild, remote, ecologically important, rainfall and oak savannah area. The Lower San Francisco Canyon is one of the wildest areas in the nation and is used by two federal endangered species, the bald eagle and peregrine falcon. The only objection to Wilderness designation for the Canyon seems to be that it would prevent vehicle use. We challenge the statement that this canyon is a "unique opportunity for this type of use." We also challenge the assertion that use of vehicle in the river bottom is a normal threat to environmental concerns or wildlife. Has an independent biologist confirmed this? We protest the continued ORV access to the Canyon as not being consistent with management of Wilderness Study areas and as not opening it year-round. The Gila and San Francisco Rivers are among the last free-flowing rivers in the southwest and Wild and Scenic River designation would help keep them that way. Both of these rivers are under the threat of dams in the Central Arizona Project Wild and Scenic River status could be an economic boost to both the Silver City and Reserve areas. (It is hoped to southern Missouri when the Current River was made Wild and Scenic.) We are also concerned about the future of

was enacted, a study of the canyon was prepared by the Museum of Northern Arizona (Riparian Ecology of the San Francisco River; Carothers, Steven W. et.al., 1962) indicated that at that time the Black Hawk was not nesting in the main canyon. In the study summary the following statement was made: "It is suggested that the mainstem San Francisco River is marginal habitat for the Mexican Black Hawk because the perennial flow of the River is sufficiently turbid that aquatic prey are relatively unavailable to the raptors". The summary also contained the statement that "There is no evidence at the present time that human occupation of the principal drainageway of the San Francisco River is detrimental to the breeding success of Mexican Black Hawks...". For this reason, the original closure is no longer warranted.

The study of the canyon mentioned above did suggest that the ORV use of the canyon may cause erosion of the river benches. This conclusion was made by the biologists that did the study and was based on observations that several benches showed evidence of channelization near the back of the benches where ORV use may have occurred. The Forest Service hydrologist has examined several similar benches and has found rocks and other objects that would have diverted high flow waters over this portion of the benches regardless of the ORV use. Most of the soils in the canyon are unconsolidated sands and erode very easily. There is no evidence that the limited ORV use of the canyon has significantly effected the natural erosion rates.

the 722,000 acres inventoried as roadless in Bare II which are not mentioned in the plan. The plan for these areas should be specifically laid out as these are still priceless areas. The public deserves to know what the Forest Service is doing for this land use. It seems the El Paso Group's recommendation is that no logging or road building be scheduled for any of these roadless areas during the first 10-year period. This Proposed Plan does not do justice to the Wilderness concept in the name of the first established Wilderness in the country, the Aldo Leopold

10

Wildlife

We support the El Paso Group's comment in the area of wildlife and second their concern that wildlife not be evaluated in connection with recreation. In the Proposed Alternative habitat improvement is directed toward big game and game bird species while we would like to see the ecological habitat structure of all species be considered evenly. The Proposed Alternative also has the most loss of mature and old-growth forest which will adversely affect those species dependent on it. Old-growth has its ecological place and function.

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You also contend that the ORV use of the canyon is inconsistent with management of wilderness study areas. We disagree. The New Mexico Wilderness Act specifically states that "... the wilderness study areas designated in this section shall, until Congress determines otherwise, be administered by the Secretary of Agriculture so as to maintain their presently existing wilderness character and potential for inclusion in the National Wilderness Preservation System; provided, that within the areas, current levels of motorized and other uses and improvements shall be permitted to continue subject to such reasonable rules and regulations as the Secretary of Agriculture shall prescribe." The canyon was open to ORV use year round when it became a Wilderness Study Area. The ORV use in the canyon actually peaked at a use level of 1184 recreation visitor days in 1980. Since that time the trend seems to be down. The 1983 data [latest compiled data] indicated a motorized use level of 438 recreation visitor days. Much of this use occurs in a small portion of the canyon. The philosophy on the Forest has been to restrict motorized use when it appears that unacceptable environmental damage will result from the continued use. With the use of the River significantly lower now than in 1980 when the closure was initiated, we can find no resource reason to continue the seasonal closure. This decision is not inconsistent with management of a wilderness study area.

Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, a decision has been made to close the canyon below Mule Creek to ORV use. The portion of the canyon above Mule Creek will be opened to ORV use year round.

74-10

In 1980, when the New Mexico Wilderness Act was passed, the Gila had approximately 753,185 acres of undeveloped area (not including Wilderness and Primitive Area). The New Mexico Wilderness Act designated approximately 39,275 undeveloped acres Wilderness and it released approximately 5,705 acres that were previously classified as Primitive. Since 1980, 20,610 acres have been developed. This leaves approximately 699,000 acres of undeveloped area on the Forest (including the two wilderness study areas). Chapter 4 of the Environmental Impact Statement has been amended to display the effects of all of the alternatives on the 699,000 undeveloped area outside of classified wildernesses. In the first decade the proposed alternative will result in the development of approximately 21,000 acres (3 percent) of the undeveloped acres on the Forest. Those areas not proposed for development as part of the planning process (including the wilderness study areas) will be managed to maintain their semi-primitive recreation opportunities. Over 97 percent of the undeveloped area on the Forest will still be undeveloped when the Plan is redone in 10-15 years. These areas will then be reconsidered for wilderness designation.

74-11

We agree that a management Plan should attempt to evaluate wildlife considering species present, populations, and habitat requirements for both game and nongame species. That is the basic approach that was used in the Gila National Forest Plan.

The first step in the developing wildlife data and wildlife relationship information was to define indicator species. Utilizing the Forest's current inventory of vertebrate species, a tentative indicator species list was developed which approximated one or more of the following criteria:

Occurs commonly as a summer, winter, or yearlong resident.
Species distribution involves relatively large portion of the Forest.
Listed as a Game Species, a threatened or endangered species, or a regionally sensitive species.

The tentative indicator species list was reduced using the following criteria:

Species habitat requirements too broad. Species populations not sensitive to changes in successional stages of vegetation type on a detectable basis. Species whose habitat requirements were not sufficiently defined to allow documentation of change or monitoring (provided known requirements could be addressed by an associated indicator species). Species whose habitat requirements within a given vegetation type would be met by habitat needs of other selected species.

Additional refinement included wildlife and fish species whose habitat requirements would address high, moderate, or low seral stages within each vegetative type represented.

After indicator species were developed, primary habitat components to be tracked were selected. The number of components that could be tracked were limited because of modeling considerations, but the final list was considered to be sufficient to project anticipated effects on indicator species. The habitat selected were old growth, cover, turkey roost habitats, squirrel habitats, and herbaceous forage and cover habitats. Even though some of these habitats were named for a specific species (turkey, squirrel) the characteristics of these habitats apply to the habitat requirements of other indicator species.

Quantities and distribution of primary habitat components necessary to maintain minimum viable populations of all indicator species were then defined. Distributions considered the maintenance of viable gene pools. No

74-12

We agree that riparian habitats are extremely important. To clarify our management objectives, the following Forestwide Standards and Guidelines have been added.

Where possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted to provide for the protection of these key areas.

Grazing in riparian zones will be managed to provide for maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserting the standards and guidelines from that document. These standards and guidelines give some specific long term goals to reach as far as riparian condition.

The changes in the Proposed Action Alternative are expected to result in an increase in riparian habitat condition over time, but the increase will still not be attained as soon as it would be if Alternative F were

Riparian Habitat

We agree that the core rely in riparian areas and for that reason recommend Alternative F because it will provide the greatest improvement in riparian stand structure, composition, condition and habitat carrying capacity. Since this improvement can be accomplished by reduced livestock concentration, lower adjacent timber harvest and fire control, the benefits would be well worth it. Improvement would result in better water quality, erosion control and biological diversity.

12

alternative was developed that reduced habitat levels below the level necessary to maintain viable populations.

Once minimum viable population habitat levels were defined, prescriptions were developed that provided habitat levels above the minimum level. Effects of other resource activities were integrated into prescriptions so total management effects, costs, and outputs could be projected. (A copy of the wildlife section of the Outputs Technical Report has been provided to the Sierra Club, which describes this process in much more detail.)

As can be seen from the above discussion, wildlife MRVDs were not the only parameter used in evaluation of habitat trends. Wildlife related RVDs were used as an economic indicator of the value of wildlife so that the economic model would have some basis for comparing the value of wildlife to the value of other resource outputs. The RVD amounts were based on the assumption that where habitat and populations of big game, upland game, waterfowl, fish and nongame species change within a given area there is a corresponding change in the attraction of associated wildlife recreation. The use of wildlife recreation along with these other habitat parameters is considered valid in projecting a picture of anticipated wildlife outputs. Effects on wildlife were evaluated by looking at changes in habitats and the effects of other resource activities and not simply by reviewing RVD levels.

You also had a concern relating to the level of reduction in old growth habitat. If the modified Proposed Action Alternative were implemented for 50 years, it would only result in a 12 percent reduction in old growth habitat rather than 24 percent projected in the original Proposed Action Alternative.

implemented. Due to the multiple use goals in the Proposed Action Alternative and the associated budget constraints, it is not possible to attain those accelerated levels of riparian management. Riparian condition is a major concern on the Forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

74-13

Thank you for your comment related to the establishment of the four research natural areas on the Forest. The Bureau of Reclamation is the lead agency in the Connor dam study. We will respond to their Environmental Impact Statement when it becomes available for public review.

74-14

While the level of soil loss associated with the modified Proposed Action Alternative is not as low as Alternative F, it has been reduced down to a total soil loss level of only 2 percent above Alternative F. It is now the lowest soil loss alternative that still produces commodity outputs at a level that helps resolve commodity output issues. It now provides for the third largest reduction in soil loss over the 50 year planning horizon.

Research Natural Areas

We encourage the establishment of the Turkey Creek, Rabbit Trap, Lugo Creek and Agua Fria Research Natural Areas. The Gila River NHA needs the active protection of the Forest Service to protect it from possible inundation from the proposed Connor Dam.

13

Soil

With significant areas associated with unstable soils and unacceptable soil erosion from grazing, roads, timbering and OHV use, the responsible Alternative again is F which has the most soil loss reduction. The Proposed Alternative has the least soil loss reduction. The Proposed Plan does not seem to have the well-being of the National Forest as its top priority.

14

74-15

We do not feel that reducing livestock numbers faster than proposed would be practical. In the Proposed Action alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

74-16

We agree. Trail maintenance in the modified Proposed Action Alternative has been to a level 288 percent above the 1984 trail maintenance level.

74-17

We disagree that the Forest should be closed to ORV use except where designated open. ORV use is recognized as a form of recreational experience. To restrict this use where no problems are occurring would be no different than restricting hiking use or any other use where no problems are occurring. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users

as possible. If ORV use becomes a problem in specific areas or if management objectives require closures, specific areas will be closed.

74-18

Nothing in the Plan is included simply to give "lip service". The Plan is the management direction for the Forest for the next 10 to 15 years.

Page

Overgrazing is one of the major causes of soil erosion. Since 50 out of 100 grazing allotments on the Gila exhibit degradation due to overstocking, and a lack of proper management, it seems to us corrective measures should be applied as soon as possible. The preferred Alternative balances permitted numbers with forage capacity by the end of the second decade while alternative F does it within the first decade. Why the delay?

15

Recreation

We encourage the increased trail maintenance and the continued development of the volunteer program. We would like to see the Off Road Vehicle policy changed to one similar to the Lincoln National Forest where use is restricted or closed with certain designated areas open to ORV use. In view of the ORV restriction on trails, the restriction of the Gila the open Gila National Forest trails is far too limited.

16

17

Interpretation of Principles

We would like to see the principles of the Plan adhere to and not just given lip service.

18

Conclusion

The Proposed Alternative is not only environmentally unsound but also not the best economic proposal. We look forward to a revised Plan incorporating C'Toole's conclusions (p. 20) and the concerns of the Sierra Club and to working further with you concerning the future management of the Gila National Forest.

Sincerely,

June Price
June Price, Chair
Southwest National Group of New Mexico
Sierra Club

cc: Secretary Block
Senator Rignall
Senator Domenici
Representative Keen

LETTER 75

FOREST SERVICE RESPONSE TO LETTER 75

75-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the Draft was at approximately 35 MMBF per year in the first decade, increasing to 48 MMBF in the fifth decade. The revised Plan projects timber harvest at 30 MMBF per year during the first decade and remaining at approximately 30 MMBF level over time. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads, a 57 percent reduction in projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed.

You also expressed a concern relating to the operation of timber sales at a loss of money to the taxpayers. It is important to note that few programs on the Forest result in a monetary gain. Many do not return any money to the treasury. Maximizing monetary profit is not the primary objective of National Forest Management. The Multiple-Use Sustained Yield Act provides that National Forest management be carried out with consideration being given to relative values of the various resources and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

Thus, National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sale of timber in some areas, for example, are designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are taken into consideration, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

75-2

We disagree that erosion on steep slopes was not taken into consideration in proposing steep slope logging. Cable logging systems used on steep slopes result in less soil disturbance than tractor logging. This activity will result in some additional soil loss (as indicated in the Environmental Impact Statement), but this soil loss will not be high enough to reduce long term productivity.

Because of the concerns expressed regarding steep slope logging, volume from steep slopes has been reduced from 8.5 MMBF to 5 MMBF.

000 75

David J. Penjelleu
Patricia A. Penfield
7307 West Street
Las Cruces, NM 88005
October 6, 1985

Forest Supervisor
Cila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Forest Supervisor:

We are writing to comment on the Draft Management Plan for the Cila National Forest. We are appalled at the irresponsible approach it takes to timber harvest and road construction.

Your proposal to drastically increase timber harvests would be both a financial burden to the American public, in those forest you manage there funds and damaging to the delicate ecological balance of the Cila. It is well documented that many logging sales are already operating at a loss, costing the taxpayer large sums of money. How can you possibly responsibly advocate building more than a thousand miles of new roads to harvest more timber for a program that is already in the red? By this proposal you give the appearance of being not only by the timber interests, when in fact your mission is to economically protect these lands for the use of present and future generations of Americans.

Your logging plan is also to not take into account the steep, easily eroded terrain of much of the Cila, and thus constitute irresponsible stewardship.

Further, your proposal will increase damage by offroad vehicles in sensitive areas by providing easier access through more than a thousand miles of new trails. Off road vehicles are simply incompatible with other uses of the land and its riparian forestation. They should be restricted to specific well established areas. They are not only off the ecological balance as permanently and are possibly damaged by humans.

We also find your lack of wilderness recommendations irresponsible. Both the Bells Hole and In at San Francisco Canyon areas clearly mandate a wilderness recommendation and it is irresponsible of you not to recommend them as such. You subvert the whole meaning of the National Wilderness Preservation System by not doing so. You also have a responsibility to manage wilderness areas adjacent to the Aldo Leopold Wilderness and along the Ingollon Rim as protected areas. Finally, you should be managing areas such as Eagle Peak and Lizard Ho as the wilderness they are.

In summary, your present plan is a big loser for the federal treasury and the taxpayer while planning solely into the hands of timber interests and irresponsible managing delicate ridges and wilderness areas.

Aldo Leopold, a forester, later shows our wilderness in the Black Range as would be achieved of the present proposal for the Gila. He would think his own life's work as all in vain. You can do better. Please, for the sake of our children, fight.

Sincerely,

Cathy A. Gifford
David J. Langley

cc: Representatives Sisco, Lujan, Richardson
Senators Domenici, Bingaman
Governor Abeyta

75-3

We disagree that the Proposed Action Alternative will increase damage by off road vehicles. ORV use is recognized as a form of recreational experience. To restrict this use where no problems are occurring would be no different than restricting hiking use or any other kind of use where no problems are occurring. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require closure, specific areas will be closed.

75-4

We have reconsidered our nonwilderness recommendation and feel that the recommendation is still appropriate. Please refer to the Wilderness Study Area section of the Proposed Action Change Summary at the beginning of this document for discussion regarding this recommendation.

75-5

Because of changes in the amount and location of timber harvest activities and changes made as a result of public concerns, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the undeveloped areas on the Forest.

LETTER 76

FOREST SERVICE RESPONSE TO LETTER 76

76-1

PACIFIC WESTERN
U-
LAND COMPANY
P.O. BOX 100 GILA NEW MEXICO 86308 (505) 534-2811
(October, 1995)

000 76

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 86150

Dear Mr. Scoggin:

Pacific Western Land Company presents the following concerning the proposed Gila National Forest Plan and the Draft Environmental Impact Statement dated May, 1995:


a. The basic thrust of the plan is misdirected. Instead of planning for increased usage for all forest users, the plan calls for less usage for the rancher (the only entity besides mining and timber that pays into the USFS coffers) because of inordinate increases in recreational use.

b. Pacific Western Land Company's forest grazing permits permitted livestock use will stabilize at some 40 percent below current levels. This is a significant reduction from 605 to 363 head annually. In reality, the number of cattle permitted could easily be increased somewhat without endangering range quality.

c. Tables are used to overwhelm the reader. Some of the tables are informative but others are meaningless. Some statements approach the absurd--(i.e. pg. 113 water yield) currently the Gila National Forest produces an estimated average annual water yield of 337,063 acre feet. A majority of the water produced is from the ponderosa pine and mixed conifer vegetative types.

d. It is imperative that all users have an opportunity to once again comment on the plan once preliminary public comments have been reviewed and integrated.

Sincerely,


William L. Allen
President

WLA:dlt

cc: Jim Shelley

The Forest Plan attempts to identify specific issues and management concerns that the Forest Service has authority to effect, and then to develop an action document that addresses these concerns. In the case of livestock management on the National Forest, our analysis indicates that the quantity of existing range developments required to sustain the current level of management are at a level that is beyond our ability to maintain with projected future funding levels. For this reason the number of AUMs will decline over time under current management. It became obvious that more not less direction should be placed on maintaining a level of livestock management consistent with other resource needs and objectives.

The Proposed Action Alternative provides for the maintenance of many of these improvements and as a result, the existing capacity for livestock is actually expected to increase. It is not projected to increase to the existing permitted number level, but it is a higher emphasis on livestock than the existing level.

Under the Proposed Action Alternative, capacity for livestock is projected to increase approximately 10 percent over existing levels and permitted numbers are projected to decrease approximately 10 percent. [The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary from this level]. The permitted numbers that can be maintained in this Alternative are higher than those that would be maintained if current management direction is continued. We feel that the Proposed Action Alternative results in a good balance of uses and will provide for a continued increase in the condition of the range resource on the Forest.

Even though the Forest permittees pay a fee to graze cattle on the Gila National Forest, costs to operate the grazing program on the Forest are higher than the amount collected from permittees. We do not perceive the Proposed Action Alternative as misdirection or providing an inordinate increased emphasis on recreational use.

76-2

The actual adjustment in livestock will depend on the results of the allotment analysis. Projections of AUM's in the Plan are only projections, the actual ability of the land to support livestock grazing and provide other resource goods and services must be in balance and this will determine the final capacity.

76-3

We disagree. However, we do understand the concern you might have in reading and understanding the large quantity of data presented in the planning documents. The example you question as absurd on page 113 of the DEIS concerning water yield is very much correct. Water yield or the water that is produced on the Gila and available to other uses is primarily generated in the Ponderosa pine and mixed conifer vegetative types. Moisture from the lower elevation vegetative types is consumed and or evaporated leaving little to be transported off the Forest.

76-4

The period for public comments for a major federal action is required to be 90 days. The Gila extended the comment period an additional 30 days to allow for a complete review. During this time several groups including the livestock permittees on the Gila met with Forest personnel to express concerns and to provide input into the final document. The advantages of going back to the public for additional comments following the 120 day period would likely add little to the improvement of the document and would be prohibitive with respect to time and cost.

LETTER 77

FOREST SERVICE RESPONSE TO LETTER 77

000 77

1829 Salina Dr
Las Cruces, New Mexico 88001
October 2, 1985

1 1
5 7 11 14 17

07 08 85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir:

We are writing to let you know of our concern regarding the draft plan for the Gila wilderness area.

We came to New Mexico a little over a year ago and have been awed by its natural beauty and varied landscape. One of the areas we have enjoyed exploring with our children is the Gila Wilderness where we have camped and enjoyed day trips. This area is a special prize in the desert state in which we live.

We are strongly opposed to any plans to reduce the natural beauty of this area, to increasing timber harvests and building large roads which would do. The planning, consideration, and foresight which has preserved White Sands National Monument should also be used in the Gila. We have an opportunity to preserve one of New Mexico's beautifully primitive forest areas for those of us who can appreciate and enjoy all that it has to offer without destroying its beauty. We urge you to take this opportunity!

Thank you for taking the time to hear our views. We hope that you will consider carefully preservation of the Gila wilderness area for the sake of all the generations to come.

Sincerely,

Linda & Larry Cox
Linda and Larry Cox

77-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade, increasing to approximately 48 MMBF by the fifth decade. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative proposes an allowable sale quantity of approximately 30 MMBF, which is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 14 years and is 45 percent below the allowable sale quantity level in our existing timber management plan.

As a result of this reduction in timber outputs and as a result of changes made to reduce the effects of development activity on presently unroaded portions of the Forest, Only 3 percent of the 699,000 unroaded acres on the Forest would be developed in the first decade. These areas will be managed to maintain their semi-primitive recreation opportunities and can be reconsidered for wilderness when the Plan is redone in 10 to 15 years. Please refer to the Proposed Action Change Summary at the beginning of this document for additional details concerning the changes proposed for the modified Proposed Action Alternative.

LETTER 78

FOREST SERVICE RESPONSE TO LETTER 78

78-1



THE RIO GRANDE CHAPTER OF THE SIERRA CLUB
SANTA FE GROUP

Mr. Kenneth C. Scoogin
Forest Supervisor
Gila National Forest
2510 North Silver Street
Silver City, New Mexico 88061

October 7, 1985

Dear Mr. Scoogin:

Enclosed are comments expressing the major concerns of the Santa Fe Group of the Sierra Club with regard to the Proposed Gila National Forest Plan and Draft Environmental Impact Statement. The El Paso Group of the Sierra Club has worked extensively to provide more detailed comments on the Plan and we support their comments. However, as a separate Group within the Sierra Club, we wish to emphasize those issues which concern us the most.

One of our primary concerns is future timber management. Under the Proposed Alternative, some 432,361 acres are classified as suitable for timber harvesting; this is more than in any other alternative. Once these lands have been deemed suitable for timber production, they become part of the timber producing base of the Forest, implying that timber can be produced economically on those lands. Forest Service guidelines for timber suitability state that land is not suited if it is proposed for uses incompatible with timber, such as wilderness; if nontimber objectives preclude timber production; or if land is not cost efficient in meeting objectives which include timber production. Much of the land classified as suitable under the Proposed Alternative is uneconomic for timber management. Some of these areas may have stands of timber that could

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade. The volume was projected to increase to approximately 48 MMBF by the fifth decade. This would have resulted in entering approximately 98 percent of the tentatively suitable timber on the Forest by the end of the fifth decade. The first decade level, and the increase in timber outputs over time, were a result of the timber benefit values used in the Plan and the projection of an increased demand over time. Demand projections and benefit values have been revised using more recent data.

Over the last 10 to 15 years the Gila National Forest has sold an average of approximately 30 MMBF of sawtimber per year. The present allowable sale quantity converted to board feet is 54.1 MMBF. The volume sold has varied from a low of less than 1 MMBF to a high of 62 MMBF. The demand projection used in the draft Environmental Impact Statement was based on the volume sold between 1970 and 1979. An increase in demand over time was projected. The Forest Management Team has reexamined this projection considering the timber sold in recent years and does not feel that projection of an increase demand over time is warranted. The average volume sold over 10 to 15 years includes both good and bad economic conditions for the timber industry. Since a true price quantity demand projection could not be made, 30 MMBF has been projected as the demanded level. The benefit values have also been revised downward. They were revised using 1978 through 1982 data and are no longer assumed to increase over time. The data used includes low and high years. It would not be appropriate to use only low years as you suggest in your comment.

As a result of the changes discussed above, the timber allowable sale quantity has been reduced in the modified Proposed Action Alternative. In order to respond to the Forest issue, a sawtimber volume of 30 MMBF is projected for the first decade (this is approximately 15 percent below the original Proposed Action Alternative). The cubic foot equivalent of this volume would be sustained over time. Timber outputs no longer increase. Using the silvicultural prescriptions proposed in the plan, this volume can be sustained on approximately 62 percent of the tentatively suitable timbered area. At this allowable sale quantity level, enough volume would be made available to maintain the Reserve N.M. sawmill, a very important source of employment in the Reserve area. This level of harvest would not provide for expansion of the timber industry but would provide for a level of output approximately equal to that harvested over the past 10 to 15 years. In addition to the direct timber benefits, integrated stand management techniques would provide for increased wildlife habitat diversity in the harvested areas. Timber harvest or fewer acres than proposed in the original Plan should result in a 43 percent reduction in on site soil loss from timber activities.

It is important to note that the National Forest Management Act does not specify that areas on the Forest must have higher timber benefits than costs in order to be called suitable. It simply states that lands have to be cost efficient in meeting objectives which include timber production. This is assured through the use of FORPLAN. All of the areas called suitable in the original Proposed Action Alternative and the modified Proposed Action Alternative are suitable.

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems was also a concern expressed by a number of people. In reevaluating the Proposed Action Alternative it was determined that the most cost efficient method of obtaining the 30 MMBF target was to log some portion of the volume from steep slope areas. This is because steep slope areas on the Forest often have relatively high volumes per acre, and logging steep slope areas in conjunction with less than 40 percent slope areas often results in construction of fewer miles of roads per thousand board feet of volume harvested. In order to respond to the concerns regarding steep slope

be harvested at a profit, but anticipated growth rates of new stands don't justify the investment in reforestation or the loss of potential wilderness land.

The primary reason so much land was classified as suitable for timber harvesting is the high timber prices used in FORPLAN justify such allocations. Timber values used in FORPLAN are the average prices bid between 1969 and 1979. However, there is no indication that these averages represent a good estimate of prices in the near future. Starting in 1980 timber prices have fallen in New Mexico. Among the reasons was the reduced subsidization by the banking industry which led to higher interest rates and a reduction in housing construction. Increases in merchantable timber from other regions of the country have also decreased the Western timber market. Although the housing industry has partially recovered, timber prices are expected to continue to remain depressed for some time into the future.

Revised estimates of future timber prices prepared for the 1995 RPA Program are much more modest, reflecting the major changes in the housing and mortgage loan market. In Region 3, prices are actually expected to decline for the next five to ten years. (In contrast to the Gila Plan which predicts price increases far greater than have so far been experienced. For example, the predicted price between 1983 and 1992 for ponderosa pine is six times recent bids and eight times those for mixed conifer.)

The Gila Plan and DEIS also assume that timber prices will dramatically increase over the next forty years, with prices expected to double by the fifth decade. These predictions were based on data from the 1980 RPA Program. Again, more recent 1995 RPA figures suggest much lower price increases for future timber sales. We recommend that Gila planners run FORPLAN models using these revised figures even though many economists consider even these figures to be too high.

As for the near future, we recommend that average market bids from 1992 to the present be used to predict timber values for the next decade. The final Gila Plan should incorporate these updated figures. Such a revision will surely have a major impact on the amount of land classified as suitable for timber production as well as on the proposed timber harvest levels.

logging, the Forest planning model was constrained to allocate the harvest of no more than 5 MMBF from steep slope areas (59 percent of that projected level in the original Proposed Action Alternative). The Forest management team feels that the use of cable systems should be pursued. In the long term, cable harvest could result in the construction of less miles of roads and less roading of presently unroaded area than obtaining 30 MMBF from only less than 40 percent slope areas. The use of cable systems on steep slope areas could eventually result in its use on less than 40 percent slope areas. This could have positive environmental benefits. (A more detailed explanation of the economics of steep slope logging is included in our response to the CHEC comments.)

In addition to the volumes from steep slope areas, soil loss and reforestation concerns were reevaluated. Cable logging systems used on steep slopes result in less soil disturbance than tractor logging of 0 to 40 percent slope areas. Timber harvesting will result in some additional soil loss (as indicated in the Environment Impact Statement), but this soil loss will not be high enough to reduce long term productivity. Reforestation should not be a problem on the areas logged. Much of the reforestation will be accomplished through natural regeneration.

Along with the changes in allowable sale quantity, the projected road construction miles would also change significantly. The original Proposed Action Alternative projecting construction of approximately 1450 miles of roads over 50 years, was reduced to approximately 620 miles in the modified Proposed Action Alternative—a 57 percent reduction. There would be a reduction of approximately 20 percent in road construction and reconstruction in the first decade. Local roads constructed as a result of timber activities and not needed for administrative purposes would be closed (approximately 65 percent). Construction and reconstruction of fewer roads and the closure of roads when no longer needed for administrative purposes should result in significantly less soil loss from roads than that projected in the original Proposed Action Alternative.

LETTER 78

Other problems with the economics of the proposed timber base is the inclusion of steep slopes, formerly excluded from timber production, and the plan to expand timber operations into now roadless areas. It is only in the past few years that cable logging has been introduced to the Southwest. Though cable logging might be an effective alternative to conventional logging methods in the Northwest, questions remain as to its use in the Southwest due to differences in climate, soil composition, regeneration and growth rates. Economically, cable logging in the Southwest has proven to be a disaster. Information gathered on cable sales in both the Carson and Gila National Forests have shown that costs have far exceeded benefits from these sales.

In the Adam-Union sale harvested earlier this year in the Gila Forest, some \$92,000 of lost revenue was generated by the cable logging portion of this sale (3.6 million board feet). In addition to these revenue losses, the Federal Treasury had to pay for sale preparation and administration, roads, and reforestation costs for these cable-logged units. Only by cross-subsidizing cable logged areas with more economical tractor logged areas was this timber sale able to show a profit at all. Not only did the Federal Treasury lose potential revenues of \$92,000 on this sale but counties in the Gila Forest which receive 25% of the gross National Forest revenues lost \$23,000 which would have gone to benefit local communities. If the Adam-Union sale is typical of future cable logged sales in the Gila, the annual loss in foregone receipts to local communities can be expected to total about \$50,000 if projected cable logging levels of 8.5 million board feet per year occur. This amount of community revenue loss will more than triple by the fifth decade when annual cable logged levels are increased to 28.5 million board feet.

LETTER 78

The Sierra Club also questions the environmental consequences of cable logging in the Gila. We feel that cable logging would only further undermine efforts to control soil erosion and watershed degradation, which the Gila Plan outlines as one of the major unchecked problems confronting the Gila Forest. Not only will cable logging result in a loss of important old growth habitat but costs of reforestation on steep slopes must be high and in many cases might prove fruitless. Recent revelations that a significant portion (32%) of the Knutsen-Vandenburg funds received by the Forest are being used to cover administrative overhead costs instead of the reforestation projects they were intended for raises the question whether adequate reforestation efforts will be carried out under current management. We ask that this practice stop. All funds raised by the Knutsen-Vandenburg Act should be used for reforestation projects only and not for administrative spending. For these reasons and the economic comments stated earlier it is the Sierra Club's position that all proposals for cable logging be dropped from the Gila Forest Plan.

The proposed timber base and management plan also threaten the loss of many remaining roadless areas within the Gila Forest with the resulting loss of future primitive recreational opportunities and vital wildlife habitat. Of all the alternatives, the Proposed Alternative "will result in the largest roaded area by the end of the fifth decade" and a trend toward conversion of nonroaded recreation opportunities to roaded opportunities. Reasons for this trend toward motorized recreation remain undocumented and poorly explained, although the trend appears to be an attempt to justify timber road building activities. The current roaded recreation capacity of the Gila has already been shown to be far greater than current use. Although increasing capacity may transfer use from one part of the Forest to another, it will not increase total use or recreation value.

The Sierra Club sees no justification for road construction in roadless timber lands at today's timber prices. New road construction into these areas would be costly under current market conditions. Even where ponderosa pine is the dominant species and slopes are gentle, new road construction costs may easily outweigh the value of the timber. Future timber sales into what are now roadless areas should be shown to be economically viable. To insure that FORPLAN does not inefficiently allocate roadless lands to timber management, planners should separate roadless from roaded categories. It may even be possible to include three levels of road category: roadless, partially roaded, and fully roaded. Different costs should be attached to each of these categories.

Another reason these roadless areas should remain as such is the potential recreational opportunities they could provide future generations. Although recreation has the greatest Forest value, the

78-2

Because of changes in the amount and location of timber harvest activities and considerations given to the issue of maintaining unroaded areas, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and available for semi-primitive type recreation. Please refer to the Unroaded Area section of the Summary of Changes located at the beginning of this document for additional discussion of the unroaded areas proposed by the modified Proposed Action Alternative.

78-3

In this portion of your comment you infer that the road construction is justified by increased recreation. There was no attempt to justify road construction through increases in recreation. If you read your own comment closely you will find that what increased as a result of road construction was roaded recreation opportunities. Nowhere in the document did it state that these opportunities would be utilized and nowhere in the analysis were opportunities valued unless they were utilized.

78-4

You state that you can see no justification for road construction in roadless timber lands at today's timber prices. It is not correct to consider only timber benefits and timber costs in any type of analysis. No

single cost results in a single benefit. As an example, costs that are called timber costs are used to plan and administer timber sales. In the project planning phase of a timber sale integrated stand management techniques are used to insure that diversity of wildlife habitats is maintained or increased. The timber harvest activities open up some stands which provide for additional wildlife forage. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this activity, even though the activity benefits wildlife, are called timber funds. As a result of this joint production situation, all costs must be considered in relation to all outputs. It is also incorrect to single out roadless areas as an entity. This description is much too broad. There are some roadless areas where the joint benefits of timber activities do warrant the costs and others where they do not.

The joint production costs mentioned above were included in the FORPLAN model developed for the Forest. You suggest that roadless, partially roaded and fully roaded areas should be separated in the analysis. We actually went one step further. Suitable timber areas on the Forest were broken into "logical timber management areas". Contiguous areas with similar costs (including road costs) were included in each logical timber management area. A road system needed to access the tentatively suitable timber was analyzed for each area. By doing so we analyzed a whole spectrum of areas with different road costs. Each area included specific road cost information.

78-5

We feel that the changes in the Proposed Action Alternative that were made between the draft and final have resulted in an alternative that balances the resources used on the Forest. We recognize the importance of recreation but do not feel that all commodity outputs must be eliminated in order to provide for recreation demand. We disagree that recreation values were not considered in the draft. Recreation values, including jobs provided by recreational use of the Forest, have been included in the draft and the final Environmental Impact Statements.

LETTER 78

FOREST SERVICE RESPONSE TO LETTER 78

78-6

Plan is allocating a maximum number of acres to commodity use. The Sierra Club questions the direction current forest management is taking. We feel the best future plan for the Gila lies in limited development and preservation of the potential recreational land.

One of the flaws of the current Gila Plan is that it fails to adequately consider the benefits derived from recreational use. Not only has recreation been shown to provide more jobs than timber or grazing activities in the forest but its future prospects for growth are equally promising. Recreation will, in the long term, provide more stability to those local communities whose economic conditions are now often dependent on the fluctuating markets of commodity products. The Sierra Club recommends that the Gila Plan incorporate the updated 1985 RPA values for recreation into their FORPLAN model. These values are nearly double those used in the Draft Plan. Use of these figures show recreation to produce ten times the benefit of both grazing and timber.

The Sierra Club is also concerned that roadless recreation use in many areas of the Gila Forest has been shown to be close to capacity. One such area is the Glenwood Ranger District, where the two Wilderness Study Areas are located. We believe that both the Hells Hole and Lower San Francisco River Wilderness Study Areas should be included in the National Wilderness Preservation System and urge the Gila Forest to recommend this action.

The Santa Fe Group of the Sierra Club fully supports the Gila Forest Wilderness Proposals of the New Mexico Wilderness Study Committee, submitted as comments to the Proposed Gila National Forest Plan and Draft Environmental Impact Statement. We differ from the Forest Service's interpretation of the New Mexico Wilderness Act (P.L. 96-550). We interpret the language in the Act to mean that while the Forest Service is not required to review roadless areas for Wilderness recommendation, it may do so if it chooses. In addition, we understand that although the Act does require the Forest Service to protect roadless lands until the revision of the Plan, the Forest Service certainly has the option to do so. By not recommending any additional Wilderness designations from an extremely large roadless land base the Gila Forest demonstrates an anti-Wilderness bias.

The reference you make to roadless recreation being at capacity on the Glenwood Ranger District was included in the CHEC comments. This is a misinterpretation of the data used to develop the Plan.

Wilderness use and capacity on the Glenwood District portion of the Gila Wilderness have been taken out of context from their relationship to the Gila Wilderness as a whole. A minor part of the Gila Wilderness is located in Management Areas 4C and 4D on the Glenwood District. However, nearly all of the present use is at trail heads from which visitors to the Gila Wilderness disperse themselves throughout the wilderness.

The present use and estimated capacity for the Glenwood District portion of the Gila Wilderness cannot be used out of context to draw conclusions about the need for additional wilderness. The Gila Wilderness is nowhere close to being used near capacity. Capacity for the Gila Wilderness is estimated to be about 513,000 RVD's. Current use is about 117,000 RVD's and using the 170 percent factor suggested in the CHEC report, current use could be expected to grow to about 199,000 RVD's in 50 years. In 50 years, capacity would still exceed projected use by 257 percent. In addition, the Blue Range Wilderness, in the Glenwood Area, is virtually unused. Present use on the Blue Range Wilderness is about 1,000 RVD's and capacity is about 40,000 RVD's. Capacity thus exceeds use by 4,000 percent. Similarly, the nearby

Aldo Leopold Wilderness has capacity that exceeds use by over 1600 percent. Capacity and use figures do not indicate a need for more wilderness in the area in the foreseeable future. Refer to the Summary of Changes section of this document for information regarding the Wilderness Study Area recommendation.

78-7

We agree that the New Mexico Wilderness Act does not preclude the Forest Service from managing presently unroaded areas to maintain the unroaded condition or to study these areas for wilderness inclusion. As stated above, the modified Proposed Action Alternative maintains semi-primitive recreation opportunities for 97 percent of the presently unroaded acres. The Forest presently has approximately 790,000 acres of wilderness (approximately 24 percent of the Forest). We feel that by managing 97 percent of the unroaded acres on the Forest to maintain semi-primitive recreation opportunities, future management options will be maintained. This will provide substantial opportunities to respond to increase wilderness demands; increase resource demands in future updates of the Forest Plan.

We disagree, however, that the unroaded areas listed by the New Mexico Wilderness Study Committee should be recommended for wilderness at this time. The following shows the portion of these areas that would be affected by development in the first decade as a result of the modified Proposed Action Alternative. Areas not developed would be managed to maintain their semi-primitive recreation opportunities.

LETTER 78

Gila planners should consider primitive (no roads, no timber harvest of any type), semi-primitive (no roads, no scheduled timber harvests) and other roadless prescriptions for roadless areas "released" by the New Mexico Wilderness Act. Some of these areas have been scheduled for timber harvest within the first or second decade there is Randal O'Toole's report has shown that no need to log these areas to meet projected timber quotas in the first ten to twenty years. It is of the greatest importance to Sierra Club members that these areas be protected as roadless, primitive areas until the first revision of the Plan. What is set aside as Wilderness in the next few decades may be all that future generations will have to enjoy. Once a de facto wilderness is logged, an irreversible decision has been made. The demand and need for wilderness can only grow as world population and development increase. All roadless areas proposed by the New Mexico Wilderness Study Committee should be dropped from the proposed timber base.

Wildlife habitat is another area that will suffer under proposed timber management plans. Planners argue that timber harvesting will improve diversity within the Gila Forest with management emphasis on increasing age class distribution in lower successional stages. Of the five critical habitat types identified on the Forest - old growth, thermal cover, turkey roosting sites, squirrel nesting sites, and herbaceous forage and cover, all but the last is expected to be dramatically reduced by the Proposed Alternative. Two hundred years from now the Proposed Alternative plans for 91% of tentatively suitable timber lands to be in early successional stages. Planners ignore the important fact that old-growth provides a high amount of vertical diversity -- forage at ground level, habitat for cavity nesters and birds at higher levels, cover at all levels -- while managed forests tend to provide only horizontal diversity.

FOREST SERVICE RESPONSE TO LETTER 78

EFFECTED	ARFA	TOTAL AC.	AC.
Gila Wilderness Additions	73,515		1,050
Aldo Leopold Wilderness Additions	98,055		0
Blue Range Wilderness Additions	10,795		0
Molan	11,630		0
Mother Hubbard	6,090		0
The Hub	7,770		0
Brushy Springs	5,790		0
Apache Mountain	14,305		0
Frisco Box	40,050		1,950
Brushy Mountain	7,890		0
Aspen Mountain	19,510		1,907
Wagon Tongue	11,560		4,000
Eagle Peak	27,180		7,105
Devil's Creek	89,595		2,500
Gila Box	24,350		0
Elk Mountain	4,475		0
T Bar	6,900		0
Canyon Creek	9,235		1,950
Taylor Creek	6,130		0
Stone Canyon	7,340		0
Wahoon Mountain	22,080		0
Poverty Creek	10,260		0
Largo	13,110		0
Sawyer's Peak	64,200		0
Meadow Creek	35,140		140
Hell's Hole	18,860		0
Lower San Francisco River	25,560		0
Dry Creek	29,560		0
	699,015		20,702

NCTF The differences between the unroaded acres displayed and the original RARE 'J' acres is a result of the New Mexico Act or a result of areas being developed since 1920.

You indicated that O'Toole stated in his report that there is no need to log these areas to meet projected timber quotas in the first ten to twenty years. Mr. O'Toole also stresses cost effective management throughout his report. What was not considered in the statement you mentioned is that a considerable investment in time and money has already been made in the preparation of timber sales in some of these areas. If all of these sales were dropped from the timber sale program, it would not be possible to offer anything close to the Forest's allowable sale quantity for several years after the Plan is implemented.

78-2

We disagree with your interpretation of the data presented in the Plan. First, you contend that 91 percent of the tentatively suitable timber lands will be in early successional stages by the end of the planning horizon. This infers that all age classes shown between 1 and 120 years old are early successional stages. We do not agree with that assumption, but even if 1-120 years is used as early successional stages, it is not appropriate to consider only suitable timber in the consideration of effects of any alternative on diversity.

Significantly reducing the Forest timber base, removal of uneconomic timber practices and ending below cost timber sales would all correct this imbalance to some extent. Another way to correct this imbalance would be implementation of uneven age management as a viable alternative to the even age practices proposed by the Gila Plan. The National Forest Management Act specifically directs planners to determine if clearcutting is optimal and that other forms of even age management such as shelterwood cutting, be used only where they are determined to be appropriate. The U S D A, Office of General Counsel has informed the Forest Service that failure to consider uneven age management in forest planning may be grounds for an appeal. Yet the Gila Plan fails to consider uneven age management in any of its alternatives. Gila planners state that even age management is utilized because it is more economic than uneven age management and that timber species appear to respond best to this form of treatment. However, Randa D'Ingle has suggested that documentation exists that indicates that uneven age management is perfectly suitable for the Gila Forest and that economically it is best where reforestation and thinning costs are considerable. The Sierra Club realizes that uneven age management may not be the best alternative for timber management in each area of the Gila. However, we feel that uneven age management should be an important part of the future timber management of the Gila Forest.

There are presently approximately 885,000 acres of timbered area on the Forest (Ponderosa pine and mixed conifer). Of this forested acreage, approximately 25 percent exists as old growth. At the end of 50 years, the original Proposed Action Alternative projected a mix of age classes with approximately 26 percent old growth. Since there is suitable and unsuitable timber scattered throughout the Forest, there would be old growth stands scattered throughout the Forest. Even if all 0-120 age timberlands are considered early successional stage, this is not a great reduction in diversity. In Alternative F the projected fifth decade mix would result in approximately 30 percent old growth.

In the final Plan the projected timber harvest activities have been modified. This would result in the retention of more of the old growth acres on the Forest. At the end of 50 years, the modified Proposed Action Alternative projects an age class mix containing 30 percent old growth.

We also disagree with the conclusions you reach by reviewing the table that indicates reductions in habitat acres. We assume you developed these conclusions by reviewing table 39 in the DEIS. This table should not be used out of context from the table 40 and 41. Even under natural conditions, the acres of habitat change over time. Distribution of habitats is just as important as the amount of acreage. Distribution is related to the direct and indirect habitat improvements (these help make habitats useable) and the coordination of wildlife needs during project planning and implementation. These factors were taken into consideration in the development of table 41. Table 41 shows that four of the seven alternatives would result in an increase in habitat diversity and carrying capacity.

78-9

Section 6(g)(3)(F)(i) of the National Forest Management Act requires that evenaged management systems must be appropriate to meet the objectives and requirements of the Forest Plan. There is no indication in NFMA that unevenaged management systems must be determined to be inappropriate before evenaged systems can be selected. In some cases, both evenaged and unevenaged systems may be appropriate to meet the goals and objectives of the Forest Plan. Then, selection of a shelterwood evenaged management system is discretionary as long as the goals and objectives of the Forest Plan are met.

Both evenaged and unevenaged management systems were evaluated for Southwestern Forest types in the Southwestern Regional Guide. Regulation 36 CFR 219.9(a)(5)(i) requires that the Regional Guide prescribe appropriate harvest cutting methods to be used within the Region according to geographic areas, forest types, or other suitable classifications. Pinyon-juniper, Rocky Mountain aspen, Southwestern mixed conifers, Southwestern Ponderosa pine, and Engelmann spruce-subalpine fir forest types were evaluated for the Southwestern Region. Silvical characteristics, shade tolerance, reproductive characteristics, existing stand structure, and incidence and susceptibility to insect, disease, and windthrow were all considered to determine appropriate management systems for each forest type (EIS Regional Guide, Appendix D). In most forest types, both evenaged and unevenaged management were considered appropriate in some circumstances. However, after all factors were considered, evenaged systems were selected as most appropriate for forest types in the Southwestern Region. (Regional Guide, page 3-12 through 3-15, FEIS Regional Guide, page 2-21 through 2-24).

The evaluation done for the Southwestern Regional Guide determined that unevenaged management is most appropriate for use in certain special management areas to meet Forest Plan objectives (Regional Guide, page 3-12 and 3-13). Since the required evaluation of appropriate management systems was done and resulting direction was published in the Regional Guide, there was no compelling need to reevaluate appropriateness of evenaged management systems.

In summary, the Draft Environmental Impact Statement for the Proposed Gila National Forest Plan has an extremely narrow range of alternative land allocations. No alternative considers removing high-cost timber lands such as roadless areas, steep slopes, low sites, and low-valued forest types from the timber base. This must be corrected. No alternative considers reducing the land base for livestock grazing. No alternative considers non-timber, non-roaded allocations for the roadless areas. Such an alternative must be developed and given serious, not token, consideration.

Sales of timber from steep slopes increases management costs and reduces Federal and county revenues. Reducing grazing capacity to ten percent above current levels costs a great deal of money and may cause environmental degradation.

Although evenage management was determined to be appropriate to meet the objectives on most of the suitable timber areas on the Forest, unevenage management was found to be appropriate to meet wildlife goals and visual objectives in some areas. Unevenage management in these areas was simulated by maintaining three or four story stands with RMYLD. Acreages of this type of vegetation manipulation were not included in the draft Plan but have been added to the Vegetation Manipulation table in the final Environmental Statement and Plan.

7B-10

We disagree that no alternatives consider removing high-cost timber lands. Costs for timber areas were developed very specifically for individual areas. Costs of all management activities were included in each prescription for each area of the Forest. The range of prescriptive management choices for each suitable timber area on the Forest included a choice that provided for no timber harvest. Therefore every alternative considered removing high cost timber lands.

7B-11

Indirectly, the alternatives do contain variations in the number of acres allocated to livestock grazing. In the Current Alternative (Alternative A), for example, the deterioration of facilities over time will result in some parts of the Forest receiving little or no use. It is not possible to predict where these areas would be or how soon the use would decline on individual areas. As a result, there was no attempt made to say that these areas would not be allocated to grazing.

Allocation of whole allotments to nongrazing options is not considered necessary. Domestic livestock grazing is a legitimate use of the National Forests. Unless grazing needs to be eliminated to meet some other specific multiple use objectives, the elimination is not considered appropriate. Your group has not indicated any multiple use objective that would result in the need to include nongrazing alternatives.

7B-12

All alternatives resulted in different development effects. Parts of the unroaded acres on the Forest would remain undeveloped under all alternatives. No alternative resulted in all of the unroaded areas remaining unroaded, but none of the alternatives resulted in the maximization of any forest resource or use. The development effects on unroaded areas were not included in the draft Environmental Statement because unroaded areas had not been identified as a public issue. The effects have been displayed in Chapter 4 in the final Environmental Impact Statement.

7B-13

Please review our response to the CHEC comments for our answer to this concern.

7B-14

We continue to feel the level of range management projected in the Proposed Action Alternative is the level needed to help resolve the range issue and to provide for continued improvement of the range resource.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

78-15

Benefit values have been reevaluated. The timber benefit value has been changed. After reviewing other benefit values we determined that changing them would not result in different solutions to the alternatives, including the Proposed Action Alternative. Alternatives have been reanalyzed using the reduced timber benefit value. [For a more complete description of benefit value changes review our response to the CHEC comments]

78-16

See response to your comment number 7.

78-17

The yield tables have been reexamined to ensure accuracy. We feel that the data in the yield tables is appropriate for use in planning for management of the Gila National Forest timber resource. [For a more complete description of this analysis please review our response to the CHEC comments]

78-18

This concern has been addressed in response to your concern number 9.

78-19

Prescriptions are available in all of the alternatives that allow the FORPLAN model to not log steep slope areas if logging these areas does not result in the most cost effective allocation needed to meet the objectives of the alternatives. The maximize Present Net Value Benchmark [an alternative not considered in detail] contained only one objective, maximization of present net value. Even this alternative resulted in logging some cable volume. The development of an alternative where all steep slope logging options were eliminated would only result in an alternative with a lower PNW than the Maximize Present Net Value Benchmark and would not add in the analysis.

78-20

We disagree. The Proposed Action Alternative includes these activities because they contribute to net public benefits. It is not our mandate to maximize returns to the federal treasury.

Planners must make major revisions

to the DEIS and Plan to correct these deficiencies FORPLAN values
for timber, grazing, and recreation should be revised to reflect
1985 RPA Program values. Prescriptions specifically designed to
protect roadless values must be developed for all roadless areas -
particularly those supported for Wilderness by the New Mexico Wilderness
Study Committee. This is of critical importance to us
Timber yield tables should be carefully reexamined to ensure
accuracy on the ground in Gila Forest conditions. A broader range
of alternatives should include uneven-aged management as well as
other non-timber land allocations. At least one alternative should
attempt to maximize present net worth by eliminating steep slopes,
commercial thins, and other high-cost or low-valued timber from
management. The Proposed Action should include inefficient practices
such as cable logging only if it can be shown that the benefits of
such practices exceed the costs to the Federal Treasury, county,
and Forest Service

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LETTER 78

FOREST SERVICE RESPONSE TO LETTER 78

Randal O'Toole's analysis shows that timber loses a lot of money, grazing at capacity levels may be worthwhile but the costs of raising grazing capacity to ten percent above current capacity is far greater than the benefits, and recreation has the highest forest value overall. His analysis indicates that the efficiency of the Plan can be greatly improved by deleting steep lands and forest types which are dominated by species other than ponderosa pine from the suitable timber base, and minimizing planned commercial thinnings. The efficient level for timber may be something less than 20 million board feet per year -- the proposed level of ponderosa pine minus steep slopes, roadless lands, low sites, and other costly areas.

Protection of roadless lands as potential wilderness is of paramount importance to us. Again, we urge the Gila Forest to use its discretion and recommend significant acreage as wilderness. Otherwise, we strongly urge the Gila Forest to designate as primitive all roadless lands supported by the New Mexico Wilderness Study Committee for wilderness designation.

In closing, the Santa Fe Group of the Sierra Club view is that the major problem with the Gila Plan is that it fails to adequately address all the needs and uses of the Gila Forest within the guidelines of multiple-use management of this country's national forests. Too often, commodity outputs and production are over-emphasized at the expense of wildlife, watershed, recreation, and biological diversity and integrity. The strong anti-wilderness bias within the Plan is most objectionable to us and we demand that roadless areas be protected until the next revision of the Gila Forest Plan.

Sincerely,

Richard Carroll

Richard Carroll
Chair, Gila Planning Review Team
Santa Fe Group of the Sierra Club

cc: Governor Joney Anaya
Senator Jeff Bingaman
Senator Pete Domenici
Congressman Joe Skeen
Congressman Manuel Lujan
Congressman Bill Richardson
Forest Service Regional Forester Sotero Muniz

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78-21

There are several portions of Randal O'Toole's analysis that are in error. Rather than repeating parts of our response to his comments here, we suggest that you review our total response to the CNEC comment.

78-22

Please see our response to your comment number 7.

78-23

We agree that the Proposed Action Alternative presented in the draft Environmental Impact Statement was in need of improvement. We feel that the Proposed Action Alternative presented in the final reflects many changes suggested by the public and provides for balanced use of the Forest's resources.

LETTER 79

FOREST SERVICE RESPONSE TO LETTER 79

78-1

It is correct that no land is recommended for Wilderness in the Proposed Action alternative, but we disagree that no land would be managed for possible future inclusion in the wilderness system. We also disagree that the allocation in the original Proposed Action Alternative is a clear message to the public that the Gila National Forest has developed an anti-wilderness ethic.

Our reasons that the Wilderness Study Areas were not recommended for wilderness are included in our response to the El Paso Sierra Club Regional Group's Comments [letter number 11, comment #2]. Even though these areas were not recommended for Wilderness designation, no development activities were planned in the areas in the first decade. In addition, no development activity was planned in approximately 620,000 of the approximately 670,000 other undeveloped acres remaining on the Forest. The National Forest Management Act regulations [36CFR 219.17] state that those areas that remain undeveloped when plans are revised [10 to 15 years] will be considered again for Wilderness classification. We do not feel that the development of approximately seven percent of the undeveloped acres on the Forest, with the subsequent plan revision reconsideration for wilderness of 93 percent, is a "clear message to the public that the Gila National Forest... has developed an anti-wilderness ethic".

The allocation in the draft Forest Plan was the initial attempt at resolving public issues and providing for a high level of public benefits from the management of the Gila National Forest. At the time issues were generated, the public involved in the issue generation process (including environmental groups) did not specifically mention the management of unroaded areas as a major concern. As a result, no issue was identified. After the passage of the 1980 New Mexico Wilderness Act (which freed areas for other multiple uses) timber sales and other development activities were undertaken in several of the areas that had been RARE "I" areas. We received no negative response to these activities from any individuals or groups. Because we had no publicly recognized issue related to management of unroaded areas and because we have had no negative response to development activities in some of these areas, there did not seem to be any compelling reason to specifically address the effects on these areas in a issue driven planning process. We do not feel that it is appropriate for your organization to suggest that "the Gila National Forest ... has developed an anti-wilderness ethic" when your organization has not made your concerns relating to the management of unroaded areas known to us before or during the planning process. As a result of comments made on the draft Environmental Impact Statement and draft Plan, these concerns have now been recognized and changes have been made in the Plan. The Plan now projects development to three percent of the existing unroaded areas in the first decade and to manage the remaining 97 percent to maintain semi-primitive recreation opportunities. Timber harvest projections have been reduced. [Please refer to the Proposed Action Change Summary at the beginning of this document for a more complete description of the changes made to the Plan.]

78-2

We agree that the New Mexico Wilderness Act does not preclude the Forest Service from managing presently unroaded areas to maintain their unroaded condition or to study these areas for wilderness inclusion. As stated above, the modified Proposed Action Alternative provides for the maintenance of the semi-primitive recreation opportunities on 97 percent of the presently unroaded acres. The Forest presently has approximately 790,000 acres of wilderness [approximately 24 percent of the Forest]. We feel that by managing 97 percent of the unroaded acres on the Forest to maintain their semi-primitive recreation opportunities, future management options will be preserved. This will provide substantial opportunities to respond to increased wilderness demands or increased resource demands in future updates of the Forest Plan.

NEW MEXICO WILDERNESS STUDY COMMITTEE

October 7, 1985

Mr. Kenneth C. Scoogin
Forest Supervisor
Gila National Forest
2510 N. Silver Street
Silver City, N.M. 86061

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Dear Mr. Scoogin:

We reviewed the Gila National Forest Plan and Draft Environmental Impact Statement with great disappointment. No land was recommended for Wilderness and no land is being managed for possible future inclusion in the Wilderness system. Indeed, the Proposed Action (PA) allocates all available land to the timber base. This is a clear message to the public that the Gila National Forest sees itself as only a cog in the industrial timber machine and has developed an anti-wilderness ethic.

Since the managers of the Gila National Forest seem to have forgotten that more than 3/4 MILLION ACRES were inventoried as roadless (and thus potential Wilderness) in the late 1970s, we have enclosed maps of all potential Wilderness in the Gila National Forest. These maps are all of 1/2" = 1 mile scale. All of the areas we have mapped must be recommended for Wilderness or at least remain unroaded, untimbered and be managed for non-motorized, primitive recreation.

We assume that the Gila National Forest reads the 1980 New Mexico Wilderness Act to "release" all land from further Wilderness consideration and that the Gila National Forest cannot study any lands for possible inclusion in the Wilderness system. Our legal advisors interpret the Act to say that the U.S. Forest Service is not mandated to conduct further studies on proposed Wilderness or to protect possible Wilderness inclusions; however, the law does not preclude the U.S. Forest Service from these options. As a result, we feel justified in our accusation of an anti-wilderness bias in the current management of the Gila National Forest.

LETTER 79

FOREST SERVICE RESPONSE TO LETTER 79

The cavalier treatment of the two Wilderness Study Areas, the Lower San Francisco River and Hell's Hole, by the Gila National Forest may not meet the legal requirements dictated by the National Forest Management Act regulations, 36 CFR 219.17(b)(2) or California v. Block, 690 F.2d 753 (9th Cir. 1982). We shall certainly read the Final Gila National Forest Plan with these requirements in mind.

In summary, all of the following areas must be recommended for wilderness designation or managed to protect their wilderness potential. Maps of these areas are enclosed.

Gila Wilderness Additions
Aldo Leopold Wilderness Additions
Blue Range Wilderness Additions
Nolan
Mother Hubbard
The Hub
Brushy Soles
Apache Mountain
Frisco Box
Brushy Mountain
Aspen Mountain
Wagon Tongue
Eagle Peak
Devil's Creek
Gila Box
Elk Mountain
F Bar
Canyon Creek
Taylor Creek
Stone Canyon
Wagon Mountain
Poverty Creek
Laroc
Sawyer's Peak
Meadow Creek
Hell's Hole
Lower San Francisco River

Sincerely,


George Crossman
New Mexico Wilderness Study Committee

cc: Senator Jaff Bingaman
Senator Pete Domenici
Governor Toney Anaya
Congressman Joe Skeen
Congressman Manuel Lujan
Congressman Bill Richardson
Regional Forester Sotero Muniz

79-3

The information pertaining to the two Wilderness Study Areas on the Forest has been expanded in the final Environmental Impact Statement. In addition to the data in the EIS, the Forest has prepared technical reports on the two areas. These contain the data needed to meet the legal requirements dictated by the California v. Block decision. They are available for public review at the Forest Supervisor's Office in Silver City, N.M.

79-4

We disagree that the unroaded areas that you listed should be recommended for wilderness at this time. Again, refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the unroaded areas on the Forest.

LETTER 80

FOREST SERVICE RESPONSE TO LETTER 80

Charles Scheninger
227 E. Coronado Road
Santa Fe New Mexico 87501
505 983 6422

000 80

October 6, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Forest Supervisor

I recently hiked and camped in the Gila Wilderness and found it to be a place of truly rare beauty and serenity due to its unspoiled nature. I camp and hike in the Jemez and Sangre de Cristo Mountains here in Santa Fe but find it quite annoying to run across cut trees, logging debris and roads. Naturally, I was horrified to hear about the shortsighted Gila National Forest Plan whose effects will be to destroy that very unique and special quality of undisturbed wilderness that people need so desperately for psychological healing in these stressful times. Your decision will have a great bearing on this continued valuable opportunity for personal healing that only undisturbed wilderness can provide.

I unequivocally *OPPOSE* any increase in timber harvesting and road construction! Remaining natural areas must be kept roadless! My research]

80-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 35 MMBF per year in the first decade, increasing to increase to approximately 48 MMBF by the fifth decade. The benefit values and projected future need figures have been modified and the modified Proposed Action Alternative proposes a sawtimber harvest of approximately 30 MMBF the first decade, which is projected to stay relatively constant over time. This level is equal to the average volume sold in the last 10 to 15 years and is 45 percent below the allowable sale quantity level in our existing timber management plan. Please refer to the Proposed Action Summary Changes at the beginning of this document for more information regarding the modified timber program.

The projected road construction miles would also change significantly. The original Proposed Action Alternative projected the construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 680 miles of roads; a 57 percent reduction. Local roads constructed as a result of timber activities and not needed for administrative purposes would be closed (about 85 percent of the local roads constructed).

into the matter leads me to conclude that timbering and road construction is }
 uneconomic and destructive to forest esthetics, wildlife and other forest }
 uses and is a waste of public money which we can ill afford at this time }

80-2

National Forests are managed for numerous "products" and amenities in addition to timber. However, many of these additional benefits are derived, at least in part, through the process of harvesting timber. These benefits may be hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. Such benefits include vegetative management, investments in future timber growth, insect and disease control, access for fuelwood gathering, wildlife management improvements, employment, and income from both commodity and non-commodity products.

Frequently a commercial timber sale is the most effective manner of achieving these resource benefits. Vegetative management is a primary purpose of these sales. Sales of timber in some areas, for example, are designed primarily to improve the quality of the remaining timber in the area, an investment in long-term future timber growth. In other areas, wildlife habitat improvement may be a primary goal. If commercial sales were not used to achieve these resource objectives, the objectives would have to be accomplished through appropriated funds or not at all.

The non-timber benefits and the long term benefits explained above are only an example of the some of the benefits that must be considered in order to evaluate the total costs and benefits of individual timber sales. When all costs and benefits are considered, the public receives a good return on its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

Timber sales should result in a net benefit to the public, but to require a profit on all timber sales would eliminate the use of this vegetation manipulation tool to accomplish other resource objectives that do not provide monetary benefits. Timber management should not be singled out and required to provide a monetary profit when recreation and other uses of the Forest are measured in terms of providing non-market public benefits. A table showing the transfer costs for all resources has been added to Chapter 2. This table shows the costs over revenues for all resources.

The modified Proposed Action Alternative actually results in an improvement of wildlife outputs over time. Many of the game species are benefited by the type of management practices conducted within timber sale areas. Through integrated stand management, diversity of age classes will be increased which is a benefit to many types of wildlife. If the management direction started in the first decade were continued for 50 years, the modified Proposed Action Alternative would only result in a long term 12 percent reduction in old growth habitat. This should provide substantial amounts of habitat for wildlife that requires high serial stage timber areas.

We share your concern for visual quality on the Forest and feel that we have provided for adequate protection. Visual quality objectives have been established for all areas of the Forest. These objectives take into consideration distance from major travelways and the position of areas in relation to where the area will be viewed. Higher priority was given to maintaining existing visual quality along major travelways and in foreground viewing areas. Most of the anticipated change in visual class will result in less visible areas. Timber and fuelwood activities are the primary activities that can effect the visual characteristics of an area. Even though special management practices are used to reduce the visual impacts of these activities when these activities are conducted along primary travelways, some change in visual quality may result. This change will be limited by the standards and guidelines in the Plan.

LETTER 80

I strongly SUPPORT wilderness designation for the Lower San Francisco Canyon and Hell's Hole areas

Areas to be preserved as roadless and used for ecological study recreation and wildlife and watershed protection should include

- * areas along the Mogollon Rim stretching from the Blue Range to the Gila Wilderness (125,855 acres)
- * freestanding wilderness candidate areas, such as Frisco Box (40,050 acres) and Eagle Peak (30,380 acres)
- * areas adjacent to Aldo Leopold Wilderness (170,160 acres)

I am considering land purchase in the Gila/Cliff area and am adamantly OPPOSED to the construction of the Corner Dam. Please allow the Gila River to remain free-flowing. Thank you for your time and attention.

Sincerely,

Charles Bensinger
Charles Bensinger

FOREST SERVICE RESPONSE TO LETTER 80

80-3

We have reevaluated our recommendation on the two wilderness study areas, and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Changes Summary at the beginning of this document for a discussion regarding this recommendation.

80-4

Due to the changes in the amount and location of timber harvest activities and changes made as a result of public concerns, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and available for semi-primitive type recreation. Again, refer to the Proposed Action Changes Summary for more discussion concerning the undeveloped areas on the Forest.

LETTER 81

FOREST SERVICE RESPONSE TO LETTER 81

000 81

September 5, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, New Mexico 88061

1985 11/11/85
S. J. P. H. H.

10/2/85

Re: Proposed Gila National Forest Plan PAGE THREE

Dear Mr. Scoggin

In response to your request for comments on the proposed Gila National Forest Plan we offer the following:

- Disagree with the statement on page 6 "Current livestock use exceeds production capability." We believe the range is capable of much greater production.
- If as stated in your letter of May 24, 1985, Range Management Emphasis and funding will be shifted to "more productive parts of the forest." We fail to see where the draft EIS has addressed the economic impact on those ranchers adversely affected and in turn what will be the management implications from those ranchers forced into bankruptcy by this policy. If you persist in this management emphasis, permittees in those less productive areas should receive a reduction in grazing fees to go along with their reduction in capacity caused by lower management intensity and since their range betterment fund contributions are being spent somewhere else. Incidentally, we feel this use of RBF to be contrary to congressional intent.
- The decision to manage the less productive areas e.g. area 7B, to range management level B appears to have been entirely arbitrary with no input from permittees concerning the level of intensity they would like to manage to. Most of us would prefer to manage the most intensive level we can economically afford.

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81-1

We agree the Forest has a much higher level of forage production than what we are currently producing. This is demonstrated with the Maximum Range Benchmark where capacity increases to 434,578 AUM's by the fifth period. This Benchmark was not an alternative considered in detail because it would greatly increase costs and it does not adequately address all the issues and management concerns identified by the public.

81-2

Implementation of the Forest Plan will start with its approval; however, increases or decreases in livestock numbers implemented to balance capacity with obligation will be accomplished in the first two decades. The validation process used to determine actual livestock numbers (the allotment analysis) is an ongoing process that varies with budgets and environmental situations. Should a reduction in livestock numbers be supported through the analysis process, the implementation will be accomplished through coordinated effort with the permittee and the Forest Service to minimize the economic hardship while meeting the resource management objective for the area. Adjustments are routinely scheduled over a period of years to minimize the economic hardships. The analysis process may indicate the AUM projection are correct, partially correct, or they may indicate the capacity and the obligation need no adjustment. Regardless of the outcome, the Forest Service has the responsibility to blend resources activities and uses to meet public demands.

81-3

Range betterment funds are allocated for improving deteriorated rangelands. The priority for expenditure of these funds depends on several factors: one is the cost benefit ratio; another is social and environmental considerations. The district ranger in cooperation with the permittee jointly consider management needs identified in the allotment management plan. Range improvements for the respective allotments are then placed to correct resource problems. Based on the quantity of funds, the priority projects are presented for review by the advisory board. Advisory boards are not currently chartered; however, recommendations by the advisory board or other individuals are then evaluated by the Forest Service and the funds are allocated. This process has worked very well on the forest. Range betterment funds are made up of 50 percent of the grazing fee paid in a given year. The quantity of funds available is not adequate to reconstruct all existing facilities on a scheduled replacement interval. Range betterment funds will be available as described above while dollars last. Higher levels of management on some allotments may not cost as much as B level on others. With this in mind, there should be no adjustment in grazing fees, but rather an increased cooperation incentive on the part of the permittee to reconstruct those facilities needed as identified in the management plan.

81-4


Management intensity for Analysis Area 7B was set at level B in the Proposed Plan. This level of management was based on permittee investment at the current level as well as the Forest Services' ability to contribute funds to support management in out years. In as much as the economic base for each permittee differs and the projected outputs for a given analysis area may not materialize as scheduled, we have rewritten the standards and guideline for each management area from "Grazing allotments generally will be managed to level ____" to "Grazing allotments generally will be managed to a range intensity level of ____ or above". The management emphasis statement for each management area has also been rewritten to read as follows: "Permittee management and investment may be used to sustain permitted numbers above projected levels provided the management emphasis can be maintained".


LETTER 81

-There is no indication of the reason for managing area 7B for wildlife since it isn't currently designated as a key habitat area and populations are low despite adequate habitat. Wildlife will also suffer when permittees are forced out of business. Who else is there 365 days a year to keep watch? The Forest Service surely isn't.

In summary we prefer Forest Management to emphasize those resources that pay their way, preferably Alternative E. We don't mind being good stewards of the land but we resent it quite highly when our contributions are belittled and our resource area, not to mention our pocketbook is made to suffer. When birdwatchers, hunters, ATV riders pay for the privilege of using their favorite resource then we will feel those resources can demand the same emphasis.

Sincerely,


O. E. Grubb


Phyllis V. Grubb


William D. Grubb

FOREST SERVICE RESPONSE TO LETTER 81

81-5

Management emphasis for increased wildlife habitat in Management Area 7B is based on the projected demands and the ability of the area to respond to the issues, concerns, and opportunities. We feel Management Area 7B has the potential to improve wildlife habitat and enhance wildlife populations as identified in the Plan.

81-6

Demands for the limited resources available on the Gila National Forest continue to grow. Management emphasis as proposed in the Proposed Action Alternative attempts to blend the demands with the resource capability on a given area. The economic cost to support each use on the Forest is greater than the funds received; therefore, all uses of the Forest require additional public funds to exist. Even though the permittees pay to graze on the Forest, the cost to operate the grazing program is higher than the amount collected from permittees. This results in dollars taken from public funds to support a single use.

LETTER 83

FOREST SERVICE RESPONSE TO LETTER 83

October 6, 1985

000 83

Mr. Kenneth C. Scoggin
Forest Supervisor
2610 N. Silver Street
Silver City, New Mexico 88061

Re: Comment on The Proposed Gila National Forest Plan
and May 1985

Dear Sir

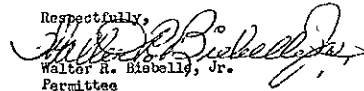
The Proposed Gila National Forest Plan-dtd May 1985 is ver biased against the grazing of domestic livestock and favors the grazing of "Mythical Wildlife", therefore I recommend you eliminate the percentage of cuts for livestock and use the present A.M.P.'s to determine stocking rates.

P.U. Studies should be correlated with the A.M.P.'s and not used separately and should not be taken when conditions are always unfavorable to the permittee. What's happening now is: The P.U. Studies are taken when results favor a reduction in A.U.M.'s. To make the study more feasible get written commitments from Federal Wildlife Service & New Mexico Fish and Game Department.

The D.E.I.S. and the P.M.F.P. documents fail to provide adequate documentation of data basis used in the elimination of A.U.M.'s. The rationale for projected A.U.M. reductions is apparently mythical.

I feel that the procedural issues have revealed a constant failure by the S O's Office to comply with federal Law & Regulations.

Respectfully,


Walter R. Bissell, Jr.
Permittee

WRBjr/lb

83-1

The management emphasis for each management area differs with the ability of the land to support resources and meet public needs. We disagree that the Forest Plan favors "Mythical Wildlife" over domestic livestock. It is true that in the Proposed Action Alternative livestock numbers are projected to decrease and wildlife is projected to increase in some management areas, but two factors must be considered before reaching the conclusion that this is an emphasis on wildlife at the expense of livestock. First, with current funding levels for range, the existing improvements on the Forest will deteriorate over time and will eventually result in a substantial reduction in livestock capacity. The Proposed Action provides for the maintenance of many of these improvements and as a result the existing capacity for livestock is actually expected to increase. It is not projected to increase to the existing permitted number level, but it would provide a higher emphasis on livestock than the existing level. The proposal provides for an increase in forage to wildlife and a much more stable range program. We do not feel this is an overall emphasis on wildlife.

83-2

Production utilization studies are designed to show the relative use of forage compared to the lands production. It makes no difference if forage production is low due to the lack of moisture or low soil potential. The study will show the actual production and the actual use occurring for a given period by a known number of livestock. The use level may be above the allowable limit for the forage species or it might show little or no use. A study is not complete without a narrative to explain the local situation regarding moisture received, conflicts with other uses, or areas of local concentration and why.

83-3

Documentation of the data base and the procedures used to project AUM's in out years is available for review in the outputs technical report located in the Gila National Forest Supervisors office.

83-4

Without knowing the specific cases where you feel the document fails to comply with federal laws and regulations, we cannot respond to the comment further.

LETTER 85

October 7, 1985

Mr Kenneth C Scoggin, Supervisor
Gila National Forest
2610 N Silver St
Silver City, NM 88061

000 85

Dear Mr Scoggin

I am writing this letter on behalf of the New Mexico Wildlife Federation, the largest sportsmen's organization in the state

We have reviewed the Gila plan in detail and have come up with following comments and suggestions

- (1) We would like to see greater emphasis to allow public access via existing roads to the Forest, particularly on the east side of the Black Range. Perhaps easements or land swaps could be employed
- (2) More consideration needs to be given to the impacts of increased timber harvest and grazing on aquatic habitats and game - fish populations
- (3) Special consideration should be given to fencing or reducing grazing pressure in riparian areas considered to be in unsatisfactory condition. This will be an important means of improving wildlife habitat conditions
- (4) We question the feasibility of the proposed quadrupling of timber production in view of the current and projected depression in the lumber market. We encourage you to focus more efforts on enhancement of wildlife and recreational values. We are vehemently opposed to the proliferation of subsidized construction of roads associated with accelerated timber harvest. In contrast we would like to see closure on non essential roads where they intrude on key wildlife habitats

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FOREST SERVICE RESPONSE TO LETTER 85

85-1

We will continue to do everything we can to maintain public access to the Forest. Your suggestion of easements or land swaps are good ways to provide access, unfortunately, they are expensive. There are only limited funds available for these types of activities. The access problems are sometimes difficult to solve and the situation is not likely to improve significantly in the near future.

85-2

Changes have been made to timber allowable sale quantity projected in the Plan. These changes are summarized along with responses to your other comments. Our rationale for the level of grazing is also included in response to some of your other comments. The impacts of both of these activities on aquatic habitats and game - fish populations have been considered. We feel the modified Proposed Action Alternative balances all resource uses and activities on the Forest. Please refer to the Summary of Changes located at the beginning of this document for a review of the changes proposed to the modified Forest Plan.

85-3

We agree that riparian habitats are extremely important. To clarify our management objectives, the following standards and guidelines have been added to the Forestwide Standards and Guidelines.

Where possible, road construction will be avoided in riparian areas.

Timber harvest adjacent to riparian zones will be conducted to provide for the protection of these key areas.

Grazing in riparian zones will be managed to provide maintenance and improvement of these important areas.

Where possible, recreation use of riparian zones will be managed to avoid damage to riparian resources.

Wildlife coordination and improvement efforts will include emphasis on riparian management.

In addition to the standards and guidelines above, our intent in regard to the management of riparian areas has been clarified by deleting the standard and guideline that stated that we would "Strive to meet the standards and guidelines for riparian management contained in the Regional Guide" and inserting the standards and guidelines from that document. These standards and guidelines give some specific long term goals to reach as far as riparian condition.

The changes in the Proposed Action Alternative is expected to result in an increase in riparian habitat condition over time. Riparian condition is a major concern on the forest. Every opportunity to meet the planned multiple use objectives and improve riparian zones will be taken.

85-4

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Sawtimber harvest projected in the modified Proposed Action Alternative is adjusted downward from 35 MMBF per year in the first decade to 30 MMBF. This amount is projected to remain at approximately level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The original Proposed Action Alternative projected construction of approximately 1450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads; 57 percent reduction in projected five decade road construction. There is also a reduction in the number of miles of roads that would be constructed in the first decade. Approximately 65 percent of these roads would be closed after timber activities are completed.

LETTER 85

FOREST SERVICE RESPONSE TO LETTER 85

- (5) We would like to see grazing pressure reduced more rapidly than the proposed schedule to expedite and enhance watershed recovery and provide more wildlife forage.
- (6) We support the designation of wilderness status of the San Francisco River Canyon. This unique area, as wilderness, will help preserve the primitive condition of the area and curtail ORV use that is essential for the welfare of bighorn sheep, black hawk and other wildlife sensitive to disturbance.
- (7) We urge you to focus more attention and effort on law enforcement to protect cultural and historical sites, ORV abuses, fuelwood theft, illegal grazing trespass, and wildlife poaching.
- (8) We endorse your increased focus on the use of fire as a management tool. We are pleased with the proposed implementation of the integrated stand management concept.
- (9) We urge you to curtail the rate of harvest of old growth timber, particularly in regard to safeguarding of adequate and properly distributed wild turkey roosts.
- (10) Due to the lack of baseline data, we encourage you to install an inter-agency system of monitoring to collect information on aquatic and terrestrial habitats and populations of key indicator species in advance of major timbering projects in order to document impacts of management.

85-5

We feel that the level of livestock grazing projected in the Proposed Action Alternative is an appropriate and attainable level that will result in improvement of riparian zones and in the protection of environmentally fragile areas. In the Proposed Action Alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

85-6

We have reassessed our nonwilderness for the tax wilderness study areas on the forest and continue to support the nonwilderness recommendation. Please refer to the Summary of Changes at the beginning of this document for additional discussion of this recommendation.

85-7

Law enforcement activities continue to increase on the Forest. We agree that a more intensive law enforcement program on the Forest would be ideal but with staffing and budget constraints we must continue to balance law enforcement with our other forest management objectives. We will continue to place a high emphasis on enforcement of cultural resource laws and theft of government property (including fuelwood). We have had some major convictions relating to theft of cultural resources in the past few years. We will continue to increase law enforcement as resource protection needs rise, but it is important to note that not even the highest level of law enforcement activity will ever totally eliminate crime.

85-8

When implementation of the original Proposed Action Alternative was projected over 50 years, we estimated that it would have resulted in a 24 percent reduction in old growth habitats. The modified Proposed Action Alternative projects only a 12 percent reduction. Reductions in the first decade would be minimal. We will continue to use integrated stand management concepts to provide for the proper distribution of turkey roosts in areas where timber activities will be conducted.

85-9

We agree that baseline data is important. The monitoring plan has been revised to put a high priority on gathering base data in areas where management actions are likely to result in habitat changes.

LETTER 85

In summary we urge you to support alternative F in view of more balanced consideration of ecological and economic considerations. We believe that alternative F will better serve the interests of all the citizens of New Mexico.

Thank you for your consideration of our comments.

Sincerely,



Will Quелlette
President, New Mexico
Wildlife Federation
300 Val Verde SE
Albuquerque, NM 87108

FOREST SERVICE RESPONSE TO LETTER 85

85-10

Alternative F, as stated, has the highest PNV, benefits, and B/C ratio; however, this alternative fails to address the issues of producing wood fiber, managing and utilizing range resources, and improving range grazing. Alternative F is the most successful at addressing the amenity types of concerns on the Forest (plant diversity, wilderness, wildlife habitat, etc.); however, the revised Proposed Action Alternative addresses both the amenity and commodity issues identified at the start of the planning process and provides the best balance of outputs, both commodity and amenity, within the identified budget limits. We feel that the modified Proposed Action Alternative provides better overall net public benefits than Alternative F. [Also please review the more detailed summary of the changes made to the Proposed Action Alternative in the front of this document.]

LETTER 86

FOREST SERVICE RESPONSE TO LETTER 86

86-1

000 86 p1

Oct 5 1985
PO Box 384
Tularosa 887 88352

Harrell P. Scroggins, Forest Supervisor
Gila National Forest
2610 New Mexico St
Silver City New Mexico 88061

11/11/85
11/11/85
PAGE THREE

Dear Sir

I have read the proposed management plan for the Gila National Forest and have the following comments. In my opinion none of the proposed actions and alternatives for the Land and Resource Management Plan are acceptable. All statements of action approach the management of the resource as if it were a commodity from which a profit will be made. I do not believe this is the mandate under which the Forest Service was designed to operate, but if it is the entire National Forest System is a failure.

I believe that the general direction which the Forest Service has taken is incorrect. The Forest Service should not be attempting to manipulate a natural resource for the benefit of a few individuals in special interest groups such as the livestock and lumber industries. Rather the resource should be allowed to follow the natural ecological process which was the case for

We disagree that the Forest Service "manipulates natural resource for the benefit of a few individuals as you suggest. As a matter of principle, we do not believe that it is appropriate to single out Forest Service timber operators or range permittees as being the sole recipients of a federal subsidy. Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid. For example, in the case of the recreation user that pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full cost for that benefit. It could be said that all recreation users on the National Forest are being subsidized. Almost all of the use and enjoyment derived from the Forest could be considered to be a subsidy, including downstream water users, fire protection to property owners, range permittees, hunters and fishermen, fuelwood users, etc. The subsidy issue which you raise is a legitimate concern; however, it should be remembered that timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

manner before the Forest Service began its current "management" practices. The Forest Service should focus its efforts on managing the people who abuse the forest resource for their own profit, always at the expense of the American taxpayer. I believe that this course of action would result in an optimum benefit to all of the American people for whom you hold the forest in trust.

An example of a group that requires closer regulation is the livestock producers who use forest lands. The members of this industry abuse the forest lands by overstocking and overgrazing, a practice which has been documented, and admitted to in the current Forest Service Draft Environmental Impact Statement (DEIS). The effects are wide spread, long lasting, and always detrimental. Effects from this abuse of the forest include stripped grasslands, compacted soils, heavy runoff, flooding, excessive devastating erosion, siltation of streams, riparian zone destruction, water quality deprivation, and stream silt reduction due to water shed inability to retain water.

86-2

Since the creation of the National Forest System, significant progress has been made in improving the productivity of rangelands on the Gila National Forest. This progress has resulted from improved management by the Forest Service and Forest grazing permittees. This progress has been especially evident in the past decade. In 1975 only 74 grazing allotments out of 152 (49%) were under satisfactory management. By 1985, 96 allotments out of 141 (68%) were under satisfactory management. Forestwide, range condition and trend has also improved. Condition and trend continue to be a problem on some portions of the Forest. Implementation of the Proposed Action Alternative will result in continued improvement in the situation and eventual resolution of existing problems.

One of the most obvious effects of abusive overgrazing in the present day ditch which splits the middle of Silver City, NM. On July 21, 1895 torrential rains fell in the denuded watershed and the much abused land was overwhelmed. By the next afternoon, main street was 35 feet below its previous level. Once again in August of 1903 another flood cut the "Big Ditch" down to bed rock - 55 feet below the original street level - and extended the excavation 15 miles down stream.

Because of livestock abuse in the past the Forest Service is working to eliminate the Pinyon-Juniper (PJ) successional stage which is the result of previous overgrazing. Once you have controlled the PJ and grass is returned, livestock producers can overstock and overgraze once again. According to the projections stated in the DEIS, there is no apparent deviation from previous practices by the livestock producers - with permission and acquiescence from the Forest Service. The resource cannot withstand this self-perpetuating attitude toward environmental management.

86-3

We disagree. There are no plans to eliminate the pinyon-juniper (PJ) ecological type from the Gila National Forest. On the contrary, management of the PJ type will be intensified to achieve a wide range of resource benefits under a sustained yield concept. The proposed management of the PJ ecosystem under sustained yield will assure its perpetuation overtime and enhance its wildlife habitat diversity. Some retreatment of old PJ control projects will be accomplished to maintain forage production for use by livestock and wildlife.

86-4

We agree with your statement that we are not proposing any major changes in our range management practices of the last 5 to 10 years. We are proud of our record of implementing sound management practices in cooperation with the range permittees. In the last 10 years we have been able to bring 22 more allotments under satisfactory management. This improved management will ultimately result in improved resource condition.

Livestock grazing is a legitimate use of the National Forests as stated in the Multiple Use Sustained Yield Act of 1960. Consequently, total exclusion of livestock is inappropriate and inconsistent with Congressional intent. Our goal is to balance permitted use with capacity within 20 years. We believe the continued cooperation of the permittees will help us achieve that goal.

The timber industry also abuses the forest resource by irresponsible practices such as unrestricted road building (paid for by taxpayers through a complicated credit system between loggers and the Forest Service), steep slope timber harvest, and clear cutting, all contributors to deforestation.

Off the road vehicles enthusiast who insist upon being allowed to drive their vehicles "anywhere" (the role advertisements show) are equally irresponsible. Their contribution to abuse of the forest would include air and noise pollution, tearing up grasslands and wildflowers, digging ruts which turn to gulches after heavy rains, and chasing wildlife for the "sport".

Petro mineral and mineral companies who demand the right to explore for new sources on forest lands, only twice in fragile and sensitive areas, when there are world surpluses of their products. There is presently an oil glut worldwide. At present production rates Saudi Arabia, with the single largest pool of known oil reserves, can continue producing for near 100 years. The American petrochemical industry alone has the true facts about how many oil wells are capable of producing but for what ever reason are capped and being

86-5

We agree that there are some timber sales where the timber costs exceed the priced benefits. However, there are no timber sales planned that would be considered below cost when both priced and nonpriced benefits are considered.

Nonpriced benefits are those benefits for which no monetary value or price can be determined. Nonpriced benefits include on-site and off-site effects, such as water quality condition, visual quality, quality of recreation experience, protection of threatened and endangered species, and impacts on local employment. Nonpriced benefits do not significantly affect the priced benefits of the resource outputs modeled for the alternatives. The majority of the changes in costs in the alternatives can be tied to priced benefits, however, the nonpriced benefits play an important role in determining management direction on the Gila National Forest. Net public benefits are affected by both the net priced benefits and the nonpriced benefits.

Timber management on the Forest produces priced benefits in the sawtimber and fuelwood that can be sold. However, the cost to produce the outputs sometimes exceeds the priced benefits. There are several nonpriced benefits that accrue as the result of applying silvicultural techniques to the timber lands: 1) insects and diseases can be controlled and more disease-resistant stands can be provided for future generations, 2) the present predominance of timber stands with similar ages can be adjusted to provide for distribution of various age stands that will increase diversity, and 3) the long-term sustained-yield capability of the timber lands can be improved. The nonpriced benefits are complimentary to the priced benefits since increased timber management leads to increased sawtimber harvests. Because of changes made to the Proposed Action Alternative, we have prepared a summary of those changes which is located at the beginning of this document. A review of this section will clarify and address some of your concerns.

86-6

We disagree with your comment that the Forest is allowing off-road vehicles to go "anywhere" they please. The management philosophy on the Forest has been and continues to be one of imposing regulations where needed to protect and manage the Forest resources while providing as much freedom to Forest users as possible. If ORV use becomes a problem in specific areas or if management objectives require additional closures, specific areas will be closed or restricted to ORV use.

86-7

Leaseable minerals (oil, gas, etc.) and locatable minerals (silver, lead, gold, etc.) are managed under different laws and regulations. Mineral activities are by law legitimate uses of National Forest Lands.

Locatable minerals are covered under the 1872 Mining Laws. This law states that "all valuable mineral deposits in lands belonging to the United States, both surveyed and unsurveyed, are hereby declared to be free and open to exploration and purchase, and lands in which they are found to occupation and purchase, by citizens of the United States ...". As a result, citizens of the United States do not have to demand the right to explore for locatable minerals, they have the right. The Forest Service does, however, have control of the surface resources and can require that reasonable protective measures be taken in the exploration of these minerals. Before any mineral actions are instituted, a plan of operation must be submitted. This is the process used to protect surface resources.

Leaseable minerals operations by contrast, are not a right. Prospecting for and exploration and development are left to the discretion of the Federal government. Based upon review of the potential impacts, the Forest recommends lease approval with stipulations to protect the environment to

withheld from inventory and production.]

All of the above are examples of problems precipitated by people and need to be addressed in a manner which will solve (eliminate) people problems.

It would not be acceptable to criticize proposed plans without offering alternative course of action.

If the Forest Service is going to consider the National Forest as a commodity for sale, the very least you should do is charge a realistic price (at least break even) for the consumption of that publicly owned resource. With money either saved or gained the Forest Service would be able to fund more regulatory personnel to keep the abuse by people to a minimum. Additionally it could assure that the harvest of that resource is accomplished by the most up-to-date ecologically sensitive methods. The Forest Service is not now receiving adequate compensation; the livestock producers are the example.

1980 The rate charge rose to \$2.32 per HUM

1982 The rate charged DECLINED to \$1.85 per

HUM as a result of fees being set according to a formula specified in the

the Bureau of Land Management (BLM). Recommendations for lease or no lease are based on received ability to protect the environment and on multiple use objectives for the area being considered. Stipulations to the lease are the tool used to protect other resource values when a lease recommendation is made.

We do not assess the national need for minerals when processing minerals requests or lease applications. In locatable mineral requests, we manage the effect on surface resources and, and on lease applications we evaluate the effect on the environment [including the effects on other resources] and make a recommendation for lease, lease with stipulations, or no lease.

86-8

The response to this comment is the same as the response to comment 1.

86-8

Public Rangeland Improvement Act.

1983 The situation became ludicrous when the Forest Service was charging \$1.00 per AUM. At that time livestock producers were paying \$0.83 per AUM for grazing rights on private lands. Concurrently the Department of Defense was charging \$1-\$11 per AUM through the use of competitive bidding.

1985 The current charge is in the neighborhood of \$1.35 per AUM.

Intentionally, an AUM has a value of about \$12.00 when it is put into the economic model for analysis. What are the intangible benefits received by the American taxpayer by this bit of mathematical hocus-pocus? Because agency costs for operating grazing programs increase with inflation and far exceed income from grazing receipts, taxpayers in 1982, paid a subsidy of nearly \$14 per animal grazed on public lands - on average of more than \$2,100.00 per permittee. Livestock grazing on forest lands in the Western States is a burden on the American taxpayer. Is increased livestock grazing the best use of the forest resource over the longest period of

We disagree with your assumption that the difference between the \$1.35 charged per animal unit month and the \$7.88 (not 12.00) used in the economic model is a result of "mathematical hocus-pocus". The \$1.35 charged per animal unit month is the return to the treasury not the benefit value that should be used in a forest planning model. If we used returns to the treasury as the method for valuing outputs in the planning model, dispersed recreation and wildlife related recreation would have no value since they return nothing to the treasury. All outputs were valued at the same point in the production process, based on the economic concept of willingness to pay. This is the proper and accepted method for valuing outputs.

9

NO! From an economic and/or aesthetic point of view, the forest would best be managed for multiple use.

My recommended alternatives would include (but not be limited to), 1) charging realistic dollar value for the consumptive use (reduction of the resource) of forest resources - possibly a good method would be competitive bidding; 2) dramatically reduce the densities of livestock using the forest resource to a level well below the calculated carrying capacity - this should allow the resource to begin restoration; 3) institute a program of exclusion of all livestock from A) riparian zones, wilderness areas, and environmentally fragile areas; B) public recreation areas such as picnic and camping areas; 4) enthusiastic and vigorous enforcement of ALL laws regulating the activities of ANY group using the forest resources.

The livestock producers are not the only economically and politically powerful group of consumptive users which should have the previously stated regulations applied to their activities.

The other groups which should be included in a program of realistic charges for use

86-10

The primary consumptive uses of National Forest lands are timber harvest, commercial fuelwood harvest, personal fuelwood harvest, domestic livestock grazing, locatable mineral mining, leasable mineral extraction, and harvest of wildlife. Timber harvest and some commercial fuelwood harvest prices are determined through a competitive bidding process. Personal fuelwood prices are set by the Forest using an appraisal system. Domestic livestock grazing fees system has been determined by congress. Locatable mineral mining is a statutory right (1872 mining laws) and as a result a fee cannot be charged. Leasable mineral fees are determined through competitive bidding or are set by the Bureau of Land Management using their regulations. Mineral fees are all controlled by the Bureau of Land Management. The State owns the wildlife on the Forest, and no fees have been set by the State.

As you can see from the above discussion, establishment of fees is a very complex process. Some are set by congress and a change in this process would take congressional action. Some are set by the Forest at a level considered fair while providing a service to the public. Still others are set by processes established by other agencies laws and regulations. The Forest Service could not change all of these various processes to a single competitive bidding process even if that did look like the best approach to take in pricing consumptive outputs.

86-11

We appreciate your goals but feel that the level of livestock grazing projected in the Proposed Action Alternative is an appropriate and attainable level that will result in improvement of riparian zones and in the protection of environmentally fragile areas. In the Proposed Action Alternative, permitted numbers are expected to decline from a 1980 level of 383,000 animal unit months to 350,000 animal unit months. This is approximately 22 percent below the maximum capacity for the Forest. The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary some from this level. The goal will be to improve environmental conditions and get permitted numbers equal to capacity by the end of the second decade. Substantial improvement will occur in the first decade.

We feel that this 350,000 animal unit month level will result in continued improvement in range management on the Forest while providing for other forest resources that require forage. Most permittees on the Forest are dependent on Gila National Forest forage for the majority of the forage consumed by their livestock. Adjustments could cause economic hardships on some permittees. Larger scale permit reductions in a short time period are not practical from an administrative standpoint. The cost and staffing required to develop sufficient detailed data to support contested adjustment actions could exceed reasonable expected funding. We feel that the Proposed Action Alternative is the best method of continuing to improve the condition of the range resource on the Forest.

You also suggest that grazing be eliminated from Wilderness. The Wilderness Act of 1964 specifically states that "the grazing of livestock, where established prior to the effective date of this Act, shall be permitted to continue". It would, therefore, not be appropriate for an alternative to have as a goal the elimination of grazing in Wilderness.

86-12

We agree law enforcement is an important activity in regulating the users of the National Forests. We will continue to use law enforcement activities pertaining to theft of government property (including fuelwood), protection of cultural resources, and safety of forest users. It is important to note, however, that even the most effective law enforcement organizations in the country have not been able to eliminate crime.

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and/or reduction of activities, are the timber industry, the chemical and mineral exploration companies, and off-the road vehicle individuals and clubs. There may be other abusive users of the forest resources, however, those specified are likely the most potentially devastating groups.

The forest resource must, by Congressional mandate, legislation, and other "agreements" manage the National Forest to include grazing, logging, recreation, and pest control (which is probably a result of forest mismanagement in the first place). However, the implementation of these activities on the National Forest brings to mind some questions which need more clarification in the proposed management plan.

- 1) Are there more ecologically sound methods of controlling forest pests than deficit timber harvest? 13
- 2) Is a substantial increase in timber harvest necessary to control insect pests and dwarf mistletoes? 14
- 3) What are the effects of livestock grazing and increased timber harvest on population size and habitat depletion of endangered species? 15

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86-13

We employ several methods for controlling forest pests. Treatments are accomplished through cultural, biological, and chemical means. Each specific disease or pest outbreak is evaluated through a site specific environmental analysis. The method of treatment is selected based on many factors including cost effectiveness, management objectives, and risk of environmental damage. More information on this forest management activity can be found on page 123 of the Draft Environmental Impact Statement.

86-14

The original Proposed Action Alternative sawtimber harvest volume was based on the timber benefit values used in the alternative and the projected future need. It was not based on using timber harvest as a method to control insect pests and dwarf mistletoe. The benefit values and projected future need figures have been modified. Please refer to the Summary of Changes at the beginning of this document.

86-15

The U.S. Fish and Wildlife Service is mandated by law to give us a biological opinion of potential impacts on Threatened and Endangered Species. We requested their formal consultation and have received their reply [see letter number 89]. It was their opinion that our proposed Forest

4) With deficit spending occurring at all levels of government, how is a substantial increase in deficit timber sales justified? 16

5) From an economic point of view, isn't it more justifiable to manage more for wildlife than for livestock and timber? 17

There are a few things which I am in favor of:

1) Increasing wilderness area 18

2) Forest Service gaining right-of-way across all private lands to forest lands which are not currently accessible to the public 19

3) General public using the forest being allowed to pay an access and users 20

fee which would allow the public equal status with commercial users

4) Permit fee increase for personal fuelwood harvest greatly increased fee charge for commercial fuelwood harvest - vigorous enforcement of regulated fuelwood harvest regulated in 12. 21

By continuing with the present course of action, any of the stated alternatives in the Land and

Plan "is not likely to jeopardize" T and E Species and "would promote" their conservation.

86-16

As mentioned in our reply to comment number 14, the modified Proposed Action Alternative would not result in an increase in timber harvest.

86-17

Based on the nonmarket benefit value assigned to wildlife recreation, and the relatively low costs associated with managing for this output, the Maximum Present Net Value Benchmark resulted in a high emphasis on wildlife. It does not, however eliminate timber harvest or livestock grazing. This is because these activities are the most cost effective method of manipulating vegetation to improve habitat for the wildlife species that are the biggest contributors to increases in recreation opportunities (game species). It is also important to note, however, that these are nonmarket benefits and as a result do not contribute to reductions in deficit spending that you have mentioned in other comments.

Nothing in the National Forest Management Act states that the Proposed Action Alternative should be the alternative with the highest PNW. The planning process is an issue driven process and the Proposed Action Alternative is designed to resolve issues and provide a high level of net public benefits in a cost effective manner. This requires careful integration of management objectives of all resources. We feel that the modified Proposed Action best meets these criteria.

86-18

The Wilderness Study Areas were not recommended for wilderness for the following reasons. Refer to the Summary of Changes section for a discussion of this recommendation.

Because of changes in the amount and location of timber harvest activities, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas of the Forest remain undeveloped and available for semi-primitive type recreation. The Summary of Changes section of this document also discusses the results of these changes to the Proposed Action Alternative.

86-19

We agree that right-of-way access across private lands is an important issue. We have developed plans to acquire the rights-of-way needed to improve both user access and to meet resource management objectives (Draft Plan page 25).

86-20

We do not have the authority to initiate a general user access fee for National Forest lands. Congress would have to pass a law authorizing user fees before the Forest Service could collect such a fee.

86-21

Fees charged for green personal use fuelwood have increased more than 250 percent on the higher use portions of the Forest in the last three years. This has been done to reduce demand on areas that have been historically the

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Resource Management Plan, the Forest Service does nothing to mitigate, reduce, or eliminate the litany of nightmare effects which result from continued irresponsible stewardship of the great natural resources of the National Forest. Be innovative, consider the forest natural resource first, not the insignificant small amount of money now being received!

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heaviest used portions of the Forest and by doing so, shift use to other less used areas. Price differences between species has also been used to encourage cutting of less popular species. Commercial sales have been eliminated on the heavy used portions of the Forest. We will continue to use price differentials as one of our management tools to regulate fuelwood outputs.

Law enforcement is another tool that is being used to manage use of the fuelwood resource. Last year we issued 84 citations and 68 warnings to users that were not in compliance with fuelwood harvest regulations. We feel that our enforcement efforts have reduced fuelwood theft and abuse on the Forest but as mentioned in our response to some of the other comments, law enforcement activities will never stop all illegal activity.