



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 II



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

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

SUMMARY

During the development of the Plan, the Forest Service has actively and 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 on average of approximately 30MMBF of sawtimber per year. The present allowable sale quantity converted to board feet is 54 MMBF. 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 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 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 OLD PA	ACRES AFFECTED MODIFIED PA	APP. % OF AREA 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 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.

CHART 1

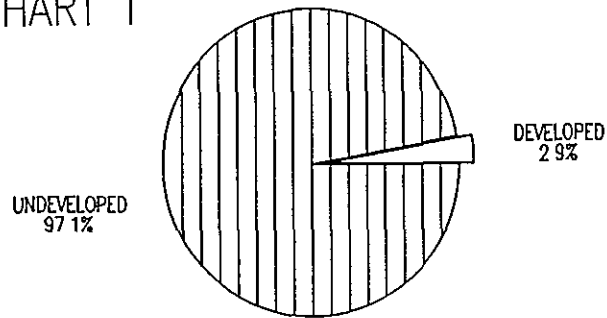


CHART 2

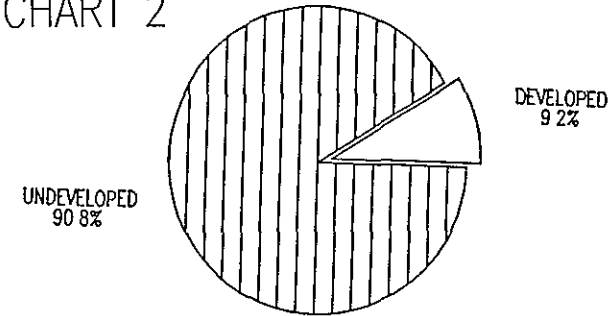


CHART 3

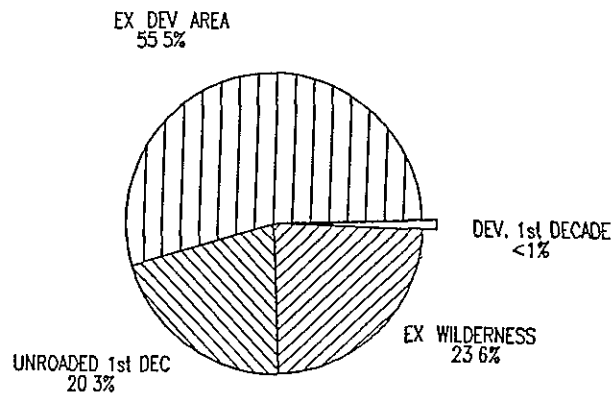


CHART 4

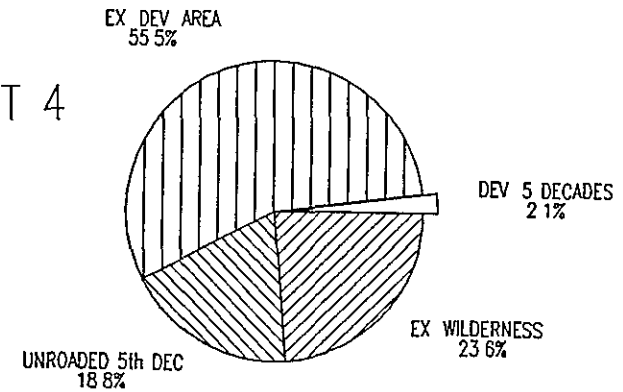


Chart 1 shows the portion of the existing 899,015 undeveloped acres that would be developed during the first decade. Chart 2 shows the portion of the existing undeveloped acres that would be developed if the Proposed Action Alternative were implemented for 50 years. Chart 3 shows the portion of the total 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.

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.

Seasonal Closure of The San Francisco River

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, Corothers, 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 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

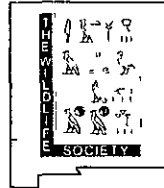
Following are the letters that the Forest Service received concerning the draft planning documents. Specific comments are bracketed and numbered. The Forest Service response to each numbered comment is included to the right of the comment.

THE WILDLIFE SOCIETY

000 87

NEW MEXICO CHAPTER

8214 Portales, NE
Albuquerque, NM 87109
October 4, 1985



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

Dear Mr. Scoggin

The Executive Board of the New Mexico Chapter of The Wildlife Society has prepared comments and directed me to transmit the following to you regarding the Proposed Gila National Forest Plan and Draft EIS.

The New Mexico Chapter of The Wildlife Society represents professional wildlife managers, researchers, administrators, and educators across the State of New Mexico. We will appreciate your serious consideration in incorporating these concerns into the final Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "E. Leon Fisher".

E. LEON FISHER
President

Enclosure

U.S. FOREST SERVICE, GILA NATIONAL FOREST SOCIETYEXECUTIVE BOARD REVIEW COMMENTSGILA NF DRAFT FIS and PLAN

The draft FIS and Plan are broad and general and provide very few specifics to be of any real value to the implementing land manager, as well as the individual(s) responsible for monitoring the accomplishment and effects of the Plan.

The lack of detail is specifically clearly brought out in the standards and guidelines in Chapter 4 of the Plan. As an example, riparian habitat is an issue on the Gila National Forest. This is good. Unfortunately, there are no specifics as to what will be done to improve unsatisfactory riparian condition on the Gila National Forest. The FIS states that riparian habitat consists of .8 of 1 percent of the 3.34 million acres on the forest. In the Forest Service National Guide of April 1983, it states that 25 percent of riparian habitat will be in satisfactory condition by the year 2000. Also, 100 percent of riparian habitats will be in satisfactory condition by 2030.

Nowhere in the FIS or Plan is it stated what the present condition of the riparian habitat is. How many of the approximately 27,000 acres of riparian habitat are in satisfactory condition?

In the Forestwide Standards and Guidelines, Chapter 4 of the Plan, page 35, under C02, it states "Strive to meet the standards and guidelines for riparian management in the Regional Guide." What does the respective Gila National Forest District Ranger have to do to comply with this standard?

In Chapter 5, Land Use Plan, of the Plan on page 298, riparian condition is the item to be monitored. In order to complete this task, it appears to us that the present condition must be known, satisfactory and unsatisfactory, as determined by the standards and guidelines in the Regional Guide. Without the baseline information, the monitoring Plan for riparian condition is not feasible.

The method applied to determine management acres on the Gila National Forest has been converted from an habitat onto 34 of the 38 management areas. Who has the responsibility for attaining the target of 25 percent riparian habitat in satisfactory condition by the year 2000?

87-1

We agree that riparian habitats are extremely important and areas in unsatisfactory condition should be improved. 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 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 concerning riparian condition.

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.

87-2

Although progress has been made during the past few decades, roughly 40-50 percent of the riparian zones on the Forest are estimated to be in unsatisfactory condition. Additional surveys are needed to refine this estimate and further develop specific riparian management plans. Riparian condition transects are programmed under the Proposed Action Alternative as a part of establishing baseline habitat data and monitoring changes over time. Integrated riparian management plans and improvements are also programmed within individual management areas on the Forest.

87-3

Please see our response to your comment number 1.

87-4

We agree. The Standards and Guidelines from the Regional Guide have been added to the Gila Plan Forest wide standards and guidelines. Baseline riparian data will be gathered before monitoring is begun.

87-5

The Forest has the responsibility to achieve planned riparian goals. This will be accomplished through the assignment of targets, financing, and associated habitat coordination on each ranger district.

LETTER 87

FOREST SERVICE RESPONSE TO LETTER 87

It is also noted that over 7000 acres of riparian habitat is in 15 management areas that have the primary management emphasis of livestock grazing. Is this part of the reason why the restoration of riparian habitat to satisfactory condition is so loose and undefined?

The specific standards and guidelines for threatened and endangered species appear to be adequate with the following: "To achieve delisting (T&E species) in a manner consistent with goals established with the Fish and Wildlife Service and the New Mexico Department of Game and Fish in compliance with approved recovery plans." Of the 22 T&E species on the Gila National Forest, only two federal listed species have approved recovery plans. A third species, bald eagles, has an approved recovery plan, but it is not applicable because it does not address wintering bald eagle. What are the standards and guidelines for the remaining 20 T&E species on the Gila National Forest?

In the EIS, Chapter 4, on page 117, Table 66 shows the number of miles of travelways to be closed by alternatives in the first three periods. This is good from the wildlife habitat standpoint.

In Chapter 4 of the Plan, on page 41, activity L04 shows the roads by number and the miles to be constructed or reconstructed. Nowhere in the Forestwide or management area standards and guidelines is there a reference to the closed miles of travelways. Have the 1360 miles of closed travelways in the PA (preferred alternative) been identified and the objective to be accomplished spelled out, or will this take place on an opportunity basis?

Incidentally, the facilities portion of the monitoring Plan on page 299 is written so that closing of these 1360 miles does not have to be done until the third decade. The monitoring of obliterated roads should include the same schedule as shown in Table 66 on page 117 of the EIS. Also, the roads to be closed and the miles per decade should be identified and included in the respective management areas.

The management area descriptions should include the road density per square mile figures so that the District Ranger knows the standard for management.

Old growth management standards and guidelines are nonexistent in the Forestwide or management area portions of the Plan, Chapter 4. What are the Gila National Forest's standards and guidelines?

We suggest the following old growth standards and guidelines be included in the Forestwide section under Timber Management.

87-6

As you mentioned livestock grazing is emphasized in 15 management areas on the Forest. However this does not mean it is at the exclusion of our riparian maintenance and improvement goals in these areas. All programmed resource use objectives for these areas will be integrated with livestock management goals.

Permitted livestock use levels will be brought in line with capacity by the second decade. Livestock capacity and management will include riparian maintenance and improvement objectives to meet satisfactory riparian conditions.

87-7

We share your concern about those locally Threatened, Endangered, and Sensitive species. Insufficient habitat data currently does not enable development of specific recovery plans; however, work by our staff and other cooperating agencies is continuing in this area and should enable development of firm management guidelines in the near future.

Our objective for these species is to maintain and improve their status and avoid population levels requiring federal protection. In line with this objective, we have incorporated the following guideline in the Modified Plan to address species not currently covered by an approved recovery plan.

"Threatened, Endangered and Sensitive species habitats found during project or management planning phases will be evaluated on the basis of the best information available. Management requirements needed to maintain or enhance habitats for these species habitats will be incorporated into implementation plans for these areas."

87-8

Thank you for comment concerning Forest travelways. The Management Area Standard and Guidelines have been modified and now contain a table with the road and travelway information that you recommend. Information regarding roads and travelways open to the public, closed to the public, and road density by management area is provided. In addition, the condition of roads and travelways constructed and reconstructed, by the end of the first decade, is also provided.

87-9

Your suggested old growth standards and guidelines generally fit well within management criteria established for old growth habitats on the Forest. The management direction within the Forest Plan is projected in terms of the specific acreage of old growth habitat to be managed for in each management area. These levels are based in part on species habitats present in each area.

This is significantly more specific to the individual management areas than the proposed broad Forestwide Guideline. The level of sustained old growth habitats within suitable timber management areas average eight percent under the Modified Proposed Action Alternative. In certain areas the old growth acreage exceeds 10 percent. This was considered necessary to satisfy species requirements within those specific areas. On a Forestwide basis considering both suitable and unsuitable coniferous forest zones, old growth habitats make up 35 percent of the forest habitat types. At the end of 50 years, the modified proposed Action Alternative projects an age class mix containing 30 percent old growth.

Old Growth

Allocate to a managed old growth prescription, enough of the capable forest land so that at least 5 percent will meet old growth conditions at all times. In order to adequately distribute old growth, management allocation will be to have not more than 10 percent of the suitable timber land in a block in old growth at one time.

Not more than 33 percent of the existing acres allocated to old growth prescriptions may be contributed by acres in unmanaged adjacent units such as wilderness, RNA's, and other areas unsuitable for timber production.

Old Growth Stand CharacteristicsPonderosa Pine

Stand size of between 100 to 300 acres and 4 chains or greater in width or grouping of stands in close proximity to provide contiguous habitat for interior-dwelling species

Give priority to managing for old growth stands adjacent to lakes and streams in potential osprey roosting and bald eagle wintering sites.

Large stands to achieve

- At least 1,100 trees/100 acres of 20 inches d b h or greater or trees ≥ 54 (tall) At least 1,400 trees/100 acres of 14" d b h or greater or trees < 54 (taller)

- At least two-storyed stands with approximately 60 GSL in the under story
- At least 130 snags/100 acres ≥ 14 inches d b h and 15 feet tall

- At least two trees/acre of down woody material 12 inches or greater in diameter and 16 feet long Fuel treatment is not to be applied until 12 tons/acre is exceeded.

Mixed Conifer (Douglas-fir and white fir)

Stand size of between 100 to 300 acres and 5 chains or greater in width or grouping of stands in close proximity to provide contiguous habitat for interior-dwelling species

Manage stands to achieve

- At least 1,500 trees/100 acres of 20 inches d b h or greater

- At least two-storyed stands with 100 GSL in understory

- At least 200 snags/100 acres of 20 inches d b h and 15 feet tall

- At least four trees/acre of down woody material 12 inches or greater in diameter and 16 feet long Fuel treatment is not to be applied until 12 tons/acre is exceeded.

On page 35 of Chapter 4 in the Plan, the Forestwide snag policy is to maintain three snags per acre adjacent to waters and openings within the woodland and coniferous forest habitat areas. What are the snag standards on the remainder of the Gila National Forest? We suggest that the Gila NF incorporate the following

- As a minimum, maintain 100 snags per 100 acres

- Nonharvest areas, such as wilderness or unsuitable timber lands, can be credited toward meeting management direction for snag management and old growth on adjacent 10,000-acre blocks with suitable timber lands. Use of adjacent nonharvest areas does not exceed one-third of the 10k block management objectives for snags or old growth

What are the cover and turkey habitat standards and guidelines for the Gila National Forest?

We suggest this information be incorporated into the Forestwide standards and guidelines under the timber management section

Stand Management10,000-acre blocks (10 blocks)

Retain maximum density of 100 turkey vulture group per section, in suitable potential turkey habitats

87-10

Your proposed minimum standards for consideration of old growth habitats again fit within original definitions (Page 170 in the DEIS and Page 314 in the draft Plan). We will however incorporate your suggested minimum characteristics into our original definitions to further clarify this important habitat component.

87-11

We appreciate your concern and the need for a snag policy for areas other than those adjacent to openings and waters. The following guideline will be incorporated in the Plan to address these other forest zones:

Maintain approximately 180 snags per 100 acres distributed over the remaining coniferous forest and woodland areas.

87-12

Suitable timber areas will be managed using integrated stand management techniques. Distribution and amount standards similar to those you suggest were utilized in determining habitat needs within each management area. By doing this for specific management areas, the existing and potential vegetative situation could also be considered. Habitat amounts above and below those suggested were included, where vegetation allowed, in prescriptions for specific management areas so the Forest Planning Model could be used to allocate the most efficient areas to meet alternative objectives. The allocated habitat acres are shown in each management area. These habitats will be distributed during the implementation stage of project planning. We feel these acre standards for each management area are more specific than Forest wide standards and guidelines would be and better reflect the Forest allocation.

Retain and/or develop an average of four turkey roost tree groups per section in identified turkey management

Pinetum management, a more common tree of predominately ponderosa pine that grows into the piñon-juniper woodland below the normal elevation of ponderosa pine. Manage pine stragglers to emphasize wildlife habitat needs by maintaining turkey roosts and 100 percent of live pine canopy except for environmental safety shows unacceptable stand-off.

Protect and manage to include hiding and thermal cover in known fawn and adult deer habitat. Activities are deferred from May 15 to June 30.

Manage forest to include 10 percent hiding cover in 10% blocks. Emphasize thermal cover management in travel, bedding areas, and reproductive areas.

Manage forest to include 10 percent hiding cover in 10% blocks. Emphasize hiding cover areas adjacent to dependable water and key openings, along known travel ways, and in pine stragglers. Hiding cover areas should be at least 200 feet wide.

Manage forest to include 10 percent of potential habitat capability for red squirrels in 10% blocks as determined by the Forest Habitat Capability Model. A need for habitat capability, protect red squirrel primary, creches at a density of one creche per 2 acres. Retain all trees within a 26-foot radius for the 10% (1/20th acre) (mixed conifer only).

In Chapter 2, 110 on page 18, the Wildlife and Fish RVDs are shown based on 1980. The figures shown for nonconsumptive use are approximately 60 percent of the recorded consumptive use. The 1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation conducted by the Fish and Wildlife Service shows that nonconsumptive use exceeds consumptive use by approximately 22 percent. It is quite apparent that the Gila National Forest is not fully capable for the full amount of Wildlife and Fish recreation in the planning process on the Forest. We suggest that you increase the nonconsumptive use to that equal the consumptive use. This correction will be in line with the Forest Service Regional Guide recommendation.

87-13

We realize the National Survey of Fishing, Hunting and Wildlife Associated Recreation for 1980 indicates nonconsumptive use exceeds consumptive use by approximately 22 percent. This data was utilized in applicable areas in the development of wildlife recreation estimates for the Forest.

Wildlife recreation data was compiled within each management area on the basis of wildlife/habitats present, public access, and the level and type of existing public use.

Within each management area, we find considerable differences in the both the wildlife type and level of public recreation use. The relative level of nonconsumptive use to consumptive use was estimated on the basis of noted uses in each specific management area on the Forest.

There are a substantial number of habitat areas in which much of the recreational use is keyed to consumptive hunting. These generally include remote areas where water and public access is limited. Within these habitat areas, we estimated nonconsumptive use levels at 25 to 50 percent of the consumptive use contingent upon variety of species present.

There are also a number of other areas where publics tend to concentrate and levels of nonconsumptive use certainly exceed consumptive use levels. These zones along streams, near wetlands, lakes etc., were considered fully in line with the National Averages where nonconsumptive use exceeds consumptive use levels.

The Forest's 1980 estimate of wildlife recreation use (265,840 RVDs) represents a summary of the data compiled within the specific habitat zones for each individual management area. A breakdown of each type of wildlife recreation use is as follows:

Big Game Hunting	75,877 RVD's
Small Game Hunting	17,318 RVD's
Non Consumptive Use	100,805 RVD's
Fishing	71,840 RVD's
Total	265,840 RVD's

The Gila National Forest is not near large population centers and generally does not receive the levels of varied wildlife recreation use experienced in many other parts of the United States. We feel these 1980 recreation levels utilized in the planning process are relatively accurate and representative. The Forest probably does have a slightly lower nonconsumptive-consumptive ratio than the national average.

000 88

Dear Sirs:

Please find below my comments concerning the proposed Gila National Forest Management Plan

1. I feel the Forest Service should continue spending the necessary dollars to maintain improvements on the forest which will benefit both wildlife and livestock

2. I feel there was an attempt to create a direct conflict between wildlife and livestock by the preparers of the proposed management plan. There is no reason why livestock and wildlife cannot work together to better the forest to benefit both concerns. When wildlife dollars are used to make improvements the livestock people should be given an opportunity to do their share by work on land or other means.

a) I don't agree with the economic value put on either wildlife or livestock. I feel livestock was too low for the amount of related values attributable to it. One value that is not recognized by the Forest Service is permit value. This value should be recognized in the report because it is a fact of many businesses.

b) Dollars for wildlife are shown coming from the treasury without any indication from Congress that the dollars will be available. There

88-1

Total resource management that integrates activities to provide for multiple use and sustained yield of the Forest resource is the goal of forest management. With a constrained budget and increasing demands on the Forest for the resources available, there must be decisions made concerning the ability of the land to produce as well as the allocation of resources. We agree that range improvements have been constructed that benefit more than just livestock management and that integrated management is beneficial to all resources. The constrained budget, however, limits our ability to reconstruct all existing range improvements and to maintain a high management intensity for all allotments.

88-2

There was no attempt to create the appearance of unnecessary conflict between livestock and wildlife; however, we do agree that the appearance was there. Through our efforts to identify potential conflicts between competing users of the forage resource and the need to reach the demanded level for wildlife, more attention is needed on the Forest for these resources. We have reviewed and revised the emphasis statements and other areas in the documents where wildlife and livestock were placed in a negative relationship to each other.

88-3

The management emphasis for a given management area and the activities necessary to produce the outputs for that area will vary. It will require an integrated blend of activities to reach and maintain the output levels listed in the Plan. The opportunity to improve the forage resource through cooperation between permittees, the Forest Service, and New Mexico Game and Fish is accomplished whenever possible; however, the level of output as expressed in the Plan will guide the future allocation.

88-4

We feel the benefit values were established correctly. If we used return to the treasury as the method for valuing outputs in the planning model, dispersed recreation and wildlife related recreation would have no value while timber, range, and minerals would control the allocation of outputs within the model. The correct basis for valuation of all outputs is based on the on-site condition of outputs without additional processing. All outputs were valued at the same point in the production process. Those not valued competitively in the market place were given a willingness to pay value (see the glossary).

The permit value and its impact on willingness to pay is unknown and varies with the economic condition of each operator. The value of \$7.88 per AUM, used in the model for cattle, represents the total value an operator would pay for grazing cattle on the Gila National Forest. Based on the results of the grazing fee study, permittees would not be willing to pay a larger fee per AUM for grazing cattle.

88-5

Funds for wildlife habitat improvement and range improvements are projected to increase. This increase is based on a constrained budget using 1980 as a base. Funding to accomplish the outputs and address the issues were increased in the Forest Plan but as you have pointed out this will depend on the funding level received.

Funding other than range betterment funds or appropriated funds can and have been used to supplement activities which improve the forest resources. Permit modifications and permittee cooperation, together accomplish range improvement work; while volunteer groups work with the Forest to develop additional wildlife habitat.

88-6

Wildlife is only one of the many uses of the National Forest. Wildlife coordination and habitat improvements do benefit wildlife but they also benefit livestock, recreation, as well as the overall quality of the environment in the National Forest. It is difficult to separate one function from the many uses because of the close interrelationships. Livestock adjustments identified in the Plan are based on existing inventories and future demands. The actual adjustment will be based on an updated range environmental analysis.

88-7

Concentration of big game as well as livestock for long periods of time in the same area can cause resource damage. It is the responsibility of the Forest Service to identify the reason for the resource damage and make the necessary corrections. We do not consider this a favor to wildlife at the expense of livestock.

for range improvements for livestock
 Anticipation of dollars for wildlife are
 used but no anticipation of grazing fee
 increases are used. There could also be an
 increase in the present fee less by improvement
 in the industry that could be anticipated.
 c) Improvements for wildlife would only
 benefit wildlife and not livestock. Actual
 decreases in livestock numbers are shown
 in favor of wildlife increases whether or
 not they are warranted. I don't feel this
 should be cut and dried.
 d) There is no attempt to control wildlife
 numbers in concentrated areas. Unlimited
 livestock numbers are reduced. This is
 a direct favor of wildlife.

6

7

8

BB-8

Management of livestock on the National Forest has a cost. The cost varies to some degree with the level of management intensity applied, [i.e. the number of fences, stock tanks, and the control of woody invasion]. Under current funding, the dollars in range are just not there to reconstruct all of the existing range improvements. For this reason, we have added a standard and guideline to the Plan that will allow a higher level of management than originally proposed if it is necessary to produce the desired outputs. Funding for the increased level of management intensity may come from permittee cooperation or from other benefiting functions.

4. In the proposed plan the range is allowed to go from a level D to level E. It shows cutting off funds for improvement because of lack of funds to support them. Several things could happen to bring this situation. If the economy improves, there will be more dollars for improvement work on the allotments. Congress could raise it in which would also make more dollars available. Another thing not considered in the plan is improvement work done by the permittees themselves. These different dollar sources should be considered in the management plan in a manner that it does not lock into the figures that are used in the plan. For instance, if wildlife numbers do not double and range improvement is maintained the holders of the livestock permits should be allowed to increase livestock numbers.

5. Just as a general comment, I feel that the livestock people were given a fair input into the whole process. I was told all the positive assumptions were given to recreational uses and all negatives were given to the livestock industry. I am not a wildlife lover but feel that we are not going to run entire lives around the needs of one aspect of life. There are people to look out for.

treated in preference to recreation. I am not advocating a direct conflict against recreation or wildlife because I feel it is very much a part of our life but the whole picture should be kept in perspective.

Jerry L. Fagan
PO Box 582
Rexburg, NM 87830

Ph # 533-6271

FOREST SERVICE RESPONSE TO LETTER

88-8

The management emphasis for each of the management areas provides the management direction for the management area. If funding or other activities prevent the outputs as planned from occurring, adjustments will be made to provide the best mix of activities consistent with the management emphasis for the area. If excess forage is available after the management emphasis has been reached, it will be allocated based on an environmental analysis that identifies the resource potential and the conflicts involved.

88-10

The livestock industry has long been a part of the total management effort of the range resource managed by the Forest Service. Opportunities were provided for input into the Forest Plan by permittees as well as the general public. With respect to your concern regarding fairness, your comments were considered along with others with differing views. The Forest Plan attempts to balance public comments and concerns with the ability of the land to produce goods and services. This means that in some cases, the land is more suitable for recreational activities or timber activities than livestock activities. It doesn't mean that we are going to do away with any of the activities but rather that they may not be the primary emphasis for that specific management area.

000 89

October 4, 1985

FS	EXP	EXE	BM
DES	HWI	WZE	AVS
NS	TWP	OPZ	PERB
TM	FMA	RADIO	RESC
TM	WV	TP	PA
ES	SOH	FE	COMPU
RBI	OSP	LS	MAIL
TMP	IA	WCI	CHY
AO	ARC		FINES

OCT 07 1985

GALA M.F.

This responds to your letter of July 9, 1955, requesting formal Section 7 consultation, as provided by the Endangered Species Act (Act). The action under consultation concerns the approval and implementation of the proposed Gila National Forest Plan for the Gila National Forest in Grant, Catron, Hidalgo and Sierra Counties, New Mexico.

Informal consultation was initiated by the Forest Service (FS) in 1980 with the Office of Endangered Species, U S Fish and Wildlife Service (Service) Albuquerque. The Service received a list of Federal threatened and endangered species from the FS and concurred in a memorandum, dated March 16, 1983. Preliminary copies of the draft Environmental Impact Statement (DEIS) and Proposed Forest Management Plan were received during an April 15, 1985 meeting. An updated list of species federally listed or proposed for listing as threatened or endangered was requested by the FS on April 17, 1985. The updated species list including Category 1 candidate species was sent to the FS on May 9, 1985. The FS initiated formal Section 7 consultation on the Proposed Gila National Forest Management Plan by letter dated July 9, 1985. On July 11, 1985, formal copies of the Proposed Gila Forest Management Plan and DEIS were received from the FS.

After the updated species list was sent to the FS, two candidate species were proposed for threatened listing with critical habitat, the spikedeuce (*Hedys fuligida*) and the loach minnow (*Tiaroga cobitis*) (Federal Register June 16, 1995). Section 7(a)(4) of the Act requires Federal agencies to confer informally with the Fish and Wildlife Service (FWS) on any action that is likely to jeopardize the continued existence of a proposed species and/or result in destruction or adverse modification of proposed critical habitat. We would be pleased to meet with you or your representatives at the earliest convenient time to discuss the protection of these proposed species.

This biological opinion is based on information contained in the DFTS and Proposed Gila Forest Management Plan, Biological Assessment of the Proposed Forest Management Plan, biological information from the New Mexico Department of Game and Fish (NMDG&F), data in our files and discussions with biologists familiar with these species

LETTER 89

2

Background Information

Adoption of the proposed Forest Plan will have long-term effects on the management of the Gila National Forest, including its resources and their uses, for the next 10 to 15 years.

Implementation of the Proposed Gila Forest Management Plan would include changes in the current management of timber, fuelwood, grazing, land ownership, fires, minerals, recreation, wildlife and riparian resources, transportation, and wilderness areas. This alternative would direct intensive management of the Forest to approach its productive capability in general, timber production, livestock grazing, and recreation facilities would increase significantly. Wildlife habitat diversity and carrying capacity would be moderately improved for some species, such as big game and game fish. Habitat improvements would increase for Federally listed threatened and endangered species with recovery plans (bald eagle, peregrine falcon, and Gila trout).

Forest Service Management Guidelines

1 Threatened, Endangered and Sensitive Species

A. Manage threatened, endangered, and sensitive animal, fish, and plant habitat to achieve delisting in a manner consistent with the goals established with the FWS and NMDG&F in compliance with approved recovery plans.

B. Consult and cooperate with New Mexico Heritage Program to achieve management objectives for threatened, endangered, and sensitive flora.

C. Conduct studies to ascertain suitability of reintroduction of endangered, threatened and proposed species into suitable habitats. This will be accomplished in conjunction with development and approval of recovery plans.

D. When management practices are proposed in listed species habitat, a biological evaluation will be conducted to assess impacts and determine needs for consultation or conference with the FWS. Consultation will be initiated for situations where listed or proposed listed species may be affected.

E. Peregrine falcon. Continue to identify existing and potential habitat for peregrine falcons as outlined in the Species Recovery Plan, with the goal of providing habitat for approximately 40 breeding pairs by the end of the fifth planning decade. Complete inventories and habitat management plans for breeding habitats as identified in approved recovery plans. Monitor management practices within designated peregrine falcon habitat and evaluate impacts. Avoid disturbance activities in peregrine nesting habitats between March 15 and August 15.

LETTER 89

3

F. Bald eagle. Provide habitats capable of supporting between 120 and 175 wintering bald eagles by the fifth planning decade. Complete inventories and habitat management plans for wintering bald eagle habitats as specified in approved recovery plans. Maintain eagle roost densities of two to six rooves per section in concentration areas. Accomplish wetland and fisheries improvements to maintain and enhance prey base for wintering bald eagles.

G. Gila Trout. Continue ongoing recovery efforts with the objective of delisting the species. Develop species into a native game fishery within selected areas identified in conjunction with the NMDG&F.

H Plants

1. Monitor management practices within occupied and potential habitat of plants listed as threatened, endangered or on the Regional Forester's Sensitive Plant List. Manage sensitive species to sustain viability and prevent the need for listing as threatened or endangered.

2. Pursue recovery activities where pertinent.

3. If species are proposed for listing, monitor actions to determine affect of management practices on habitat and the need for conference with the Service.

4. Monitor the status of Federal listings. If elevated to threatened or endangered status, determine if consultation with the Service is required.

Endangered and threatened species that may be affected by the proposed Forest Plan include the bald eagle (*Haliaeetus leucocephalus*), peregrine falcon (*Falco peregrinus anatum*), Gila trout (*Salmo gillae*), and Chihuahu chub (*Gila nigrescens*).

The bald eagle, a winter inhabitant and migrant of the Gila National Forest, was listed as endangered on March 16, 1978 in the contiguous U.S., except for several northwest and Great Lake States where it was designated as a threatened species. In 1982, an estimated 350 bald eagles were recorded in New Mexico during the mid-winter period. Approximately 70 bald eagles wintered in the Gila National Forest during 1990. They depend upon lands that provide roosting and perching habitat in close proximity to an abundant food base.

The peregrine falcon, an inhabitant of the Gila National Forest, was listed as endangered on October 13, 1970. This falcon, formerly widespread throughout North America, now exists as a breeding species only in disjunct populations including those found in the southern Rocky Mountains. By 1970, the peregrine falcon was extinct in the eastern U.S. and undergoing rapid declines throughout the rest of North America as a result of pesticide contamination. Today, in the Rocky Mountain/Southwest region of the U.S., less than 20 percent of the estimated historical population of breeding pairs exist. About 22 falcons were reported from the Gila Forest in the summer of 1990.

The Gila trout, indigenous to the headwaters of the Gila River drainage in Arizona and New Mexico, was listed as endangered on March 11, 1967. Presently, nine streams within the Gila National Forest in New Mexico support populations of Gila trout. Five of these streams contain natural populations, four other streams have populations established by transplants. Less than 10,000 Gila trout, consisting generally of stunted fluctuating headwater populations, are believed to exist in these waters. The historic range and abundance of this species has been drastically reduced as a result of hybridization and competition with non-native trout, heavy fishing pressure and habitat alteration. Flood and drought appear to be the two most important factors presently influencing the abundance and age composition of Gila trout populations in the Gila National Forest.

The Chihuahua chub was listed as a threatened species on October 11, 1953. This species is endemic to the Guzman Basin and occurs in the Mimbres River and tributary springs near Bear Canyon Reservoir in New Mexico and in northern Chihuahua, Mexico. Of the 21 different localities in which this species was found historically, less than half contain the species today and only four locations support healthy populations. The Mimbres River basin population is located adjacent to Gila National Forest lands and is the last wild breeding population in the United States. Factors that have contributed to its decline include habitat destruction and deterioration, such as water diversions, dam construction, water pollution, deforestation, excessive ground water pumping and possibly predation/competition from introduced fish species. Today, the wild population of the Chihuahua chub in the U.S. is estimated between 100 and 200 individuals and remains highly vulnerable to population declines and extirpation.

Impacts

Implementation of the Proposed Management Plan could change bald eagle foraging behavior on the Gila National Forest by affecting its prey base. Abundance and distribution of prey species could be altered as a result of management changes in livestock grazing, timber production, fire management, and recreation activities. Roosting and perching habitats could be adversely impacted by timber harvesting, recreation activities and vehicular access. These impacts on the bald eagle are not likely to occur because of the aforementioned management guidelines included in the proposed plan.

The habitat changes and human activities resulting from the Proposed Gila Forest Management Plan could disrupt the peregrine falcon's behavior patterns during its sensitive reproduction period. However, the implementation of the plan's management guidelines (listed above) should preclude these impacts.

Habitat changes and human activities associated with the Proposed Management Plan could affect Gila trout populations in the Gila National Forest. Potential siltation from increased timber production, grazing, prescribed fires, road construction, and recreation facilities near riparian areas could decrease the densities and distributions of Gila trout through reduced aquatic habitat quality/quantity and reproductive success. These impacts are not likely to occur with the implementation of the management guidelines mentioned above.

Although the existing Chihuahua chub population does not occur on Forest lands, there is the potential for them to occur there through future recovery efforts and/or natural population expansion. In the event this species eventually occurs on Forest lands, further consultation with the Service would be required.

Biological Opinion

Based on the preceding information, it is our biological opinion that your approval and implementation of the Proposed Management Plan for the Gila National Forest is not likely to jeopardize the continued existence of the peregrine falcon, bald eagle, Gila trout or Chihuahua chub and would promote the conservation of the peregrine falcon, bald eagle, and Gila trout. Although no special habitat protection/enhancement actions for the Chihuahua chub were identified by the FS, these actions can be incorporated into the Forest Management Plan when this species' recovery plan is complete.

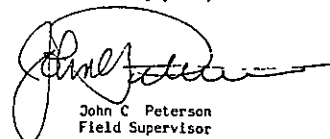
Of the alternatives described in the Proposed Gila National Forest Plan and DEIS documents, alternatives "E" and "F" would provide management measures that better promote the conservation of these four listed species, if implemented.

Further consultation is not required unless new information becomes available concerning the four listed species, new species are listed that may be affected by this action, or the proposed action is modified in a manner not considered in this biological opinion.

Because of the general nature of the actions proposed in the Proposed Gila Forest Management Plan, the FS will have to consult with us on specific actions that may affect listed or proposed species.

We appreciate your interest and efforts in conserving endangered and threatened species.

Sincerely yours,



John C. Peterson
Field Supervisor

cc
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Heritage Program, New Mexico Natural Resources
Department, Santa Fe, New Mexico
Director, FWS, Office of Endangered Species, Washington, D.C.
Forest Supervisor, Gila National Forest, Silver City, New Mexico
Regional Director, FWS, HR and SE, Albuquerque, New Mexico

LETTER 90

Sanctuary North Forest
Federal Highway 117K & 72nd
Albuquerque NM 87131

000 90

Since the time the wilderness study areas were not recommended
for wilderness - please see that you try to protect as much as possible
these areas as roads and harvesting of timber also protect the
non-game wild life.

Management details re the work area ranges and road
classification

Thank you

Ruth Becking

FOREST SERVICE RESPONSE TO LETTER 90

90-1

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 recreation. Please refer to the Proposed Action Summary Changes at the beginning of this document for a discussion of the existing unroaded areas on the Forest.

90-2

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 increases over time. Coniferous forest habitats are maintained at a level that compliments 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 (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 individual species. Effects of management activities on game and nongame indicator species will be monitored.

LETTER 91

FOREST SERVICE RESPONSE TO LETTER 91

Sept 14 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000 91

Dear Sir

I submit this letter as a public comment on the draft management plan that has been prepared for the Gila National Forest. The preferred alternative of this plan will have disastrous consequences if it were to be implemented. There is already too much timbering taking place in the Gila National Forest, and the preferred alternative proposes to almost double the harvest, from 38 million board feet per year to 65 million board feet. Such a harvest cannot be realized or sustained without opening up previously un-timbered areas and the construction of many miles of new roads. This would lead to the destruction of thousands of acres of presently undisturbed wildlands, and is unacceptable.

Not only is timber harvesting destructive of wildlands, but it damages other important values of the forest. Soil is washed away from the timbered and roaded areas, impairing regrowth, reducing water quality, and damaging riparian wildlife habitat downstream. One of the primary values of the forest is as a watershed, and this value would be impaired by the proposed timbering increase. The timbering is also uneconomical, and would become even more uneconomical under the proposed plan. The costs are large because the logging occurs in remote areas and because logging roads are expensive to construct and to attempt to reclaim. It costs the government money to sell timber, and this is also unacceptable in these days of large federal deficits. The nation needs and will continue to need timber, but this should not be provided at an unrealistically low price, nor in a way which forever changes one of our nation's greatest treasures, its national forests and wildlands. Rather, timber should be grown on timber farms operated by private companies on private lands in areas where soil will not be damaged or lost and where there is greater rainfall.

For these reasons, the planned timbering in the Gila National Forest should be decreased, not increased, in the management plan.

The best and highest use of the National Forest is that the remaining roadless lands be left roadless and be preserved or allowed to revert into a natural state for the benefit of future generations. The management by non-development also preserves and protects the uses of the land for ecological studies, recreation, wildlife habitat, and as a watershed. In particular, lands which should be so preserved include the lands along the Mogollon Rim from the Blue Range to the Organ Pipe Cactus National Monument, and the Aldo Leopold Preserve in the Black Range. It was altogether fitting and proper that the Black Range wilderness be called the Aldo Leopold Wilderness, but at the same time it was dismaying that so much

81-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Please refer to the Proposed Action Summary Changes located at the beginning of this document for the details concerning the revised timber program.

81-2

Soil loss from logging is controlled by the use of Best Management Practices determined through the State 208 water quality planning efforts. Although soil loss will occur, it will not be significant enough to effect the long-term productivity of the site. 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.

We agree that the watershed is one of the primary values of the Forest. Watershed condition is projected to improve over time as a result of management practices implemented in the Proposed Action Alternative.

81-3

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 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, 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 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 its timber investments. We will, however, continue to search for ways to reduce costs and increase benefits.

81-4

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 of the Forest remain undeveloped. Again, refer to the Summary of Changes at the beginning of this document for more discussion of the undeveloped areas on the Forest.

Page 2

land within and around the original Black Range Primitive Area that is de facto wilderness was omitted from the Wilderness. The least that can be done is to leave these lands alone as buffers for the Wilderness areas.

The present management plan considered two areas for possible Wilderness designation, these being the Lower San Francisco Canyon and the Hells Hole areas. The preferred alternative recommends both for non-wilderness use, but I would urge the Forest Service to reverse this recommendation. The Lower San Francisco Canyon area is a beautiful example of desert southwest riparian habitat which has a remarkable diversity of plant and animal life, but which is a fragile environment that needs and deserves to be protected from off-road vehicular use. The rugged canyons, peaks, and cliffs of the larger Hells Hole area is also deserving of Wilderness designation, among other things the area provides excellent opportunities for primitive recreation and solitude.

In closing, I would just like to say that the Forest Service faces a big challenge in deciding how our National Forests will be managed over the long term. The Forest Service does not exist to serve the interests of the timber industry, yet it has done so for many years. Some changes in this bias were beginning to emerge in recent years, but the decisions of the proposed management plan represent a reversal back to the timber mentality which, if implemented, will continue to call into question the ability of the Forest Service to manage our national lands properly. The American people look back with pride at the then difficult decision which established our national forests. It was the right thing to do. At this point, the Forest Service and the Agriculture Department should ask themselves how their actions which result from present decisions will be viewed 40 to 50 years down the road, by the generations of our great-grandchildren. Just as we have appreciated that our national forests were set aside in previous years, so will future generations be glad if these lands are not all carved up, and if as much as possible of the remaining roadless and wild lands are preserved.

Thank you for the opportunity to express my views

Sincerely,

Paul R. Krehbiel

Paul R. Krehbiel
705 Pitch
Socorro, N M 87801

cc: Pete Domenici,
Sen. Jeff Bingaman (U S Senate, Washington, D C 20510)
Rep. Bill Richardson (U S House of Representatives)
Gov. Tony Anaya (State Capital, Santa Fe, N M 87503)

81-5

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation. The Summary of Changes section of this document provides the rationale for this decision.

You also indicated a concern with ORV use in the Lower San Francisco River 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, include 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 and has been dropped in the Proposed Action Alternative.

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 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.

81-6

We agree. Managing our forests to achieve the best balance of amenity and commodity values is a challenge. Since its inception, the Forest Service has met the changing needs of the nation. As the population of the nation increases it becomes increasingly difficult to meet the total needs of the various groups demanding goods or services from our public lands. Management strategy and philosophy has been developed from various laws in the past. New laws will continue to be passed in the future to address the role our public lands are intended to play in meeting the future needs of the nation. Since the inception of the wilderness system, it has been subject to periodic reviews for additions to the system. The Gila National Forest Plan will continue to address increased needs for wilderness addition during the revision process in 10 to 15 years.

LETTER 92

FOREST SERVICE RESPONSE TO LETTER 92

000 92

3 October 1985
2917 Pasaje del Herrero
Santa Fe, New Mexico 87505

Forest supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 07 '85

DATE RECEIVED

Dear Sir

My wife and I have backpacked in the Gila several times and we love the area very much. We would like to comment on the Gila National Forest 50-Year Plan.

We certainly oppose increasing the timber harvest and increasing road construction. These activities destroy what to us and many others is a valuable and very hard to replace natural resource which should be enjoyed by many forever. Further, these activities are uneconomic, damaging to other forest uses and destructive to other wildlands.

We support wilderness designation for

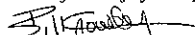
- o Lower San Francisco Canyon (6,700 acres)
- o Hells Hole (18,860 acres)

Also, please manage the following areas as roadless and undeveloped for semi-primitive, non-motorized recreation so as to retain their value for ecological study, recreation, wildlife habitat and watershed protection.

- o areas along the Mogollon Rim stretching from the Blue Range to the Gila wilderness (125,855 acres),
- o freestanding candidate wilderness areas, such as Frisco Box (40,050 acres) and Eagle Peak (30,380 acres), and
- o areas adjacent to Aldo Leopold wilderness (170,160 acres)

We hope you will do whatever you can to preserve this vital area. You certainly have our support and that of many, many others, I'm sure.

Very truly yours,


Bill Crowder

92-1

As a result of the comments received, demand projections and benefits values for sawtimber have been revised and updated using more recent data. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of the timber program as proposed by the modified Forest Plan.

We feel that these changes will result in balanced use of the Forest's resources.

92-2

We have reevaluated our recommendation for the two wilderness study areas, and continue to support a nonwilderness recommendation based the rationale provided in the Summary of Changes section at the beginning of this document.

92-3

Again, please refer to the Proposed Action Summary of Changes section located at the beginning of this document for a discussion of the proposal for the existing unroaded areas within the Forest. Changes to the amount and location of timber harvest activities have been proposed as a result of public concerns and revisions to the timber benefit values.

000 93

October 4, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City New Mexico 88061

DATE RECEIVED

Dear Sir

What a shame it is that the Forest made famous as the home of the first wilderness area in America should now be proposing a course of action which would destroy wilderness values.

We are writing to urge that you reconsider the "preferred alternative" recommended in the draft management plan issued in June, 1985. Doubling the timber harvest can only be a disaster both ecologically and economically. In particular, plans to build enough road to reach to Chicago will have severe negative impacts on all of the other multiple uses. Roadbuilding causes erosion, pollutes watersheds, inhibits wildlife, and destroys archaeological and recreational values. Furthermore, it eliminates de facto wilderness areas and precludes their designation for wilderness preservation.

Specifically, we request that you designate for preservation as wilderness the two areas known as Lower San Francisco Canyon and Hell's Hole. The former is a prime and precious remnant of lower Sonoran riparian woodland habitat, while the latter is characterized by excellent opportunities for primitive recreation. Both of these areas are threatened by off-road vehicle use unless they are preserved as wilderness.

Other areas which should be managed in their pristine primitive condition to preserve recreational, wildlife, watershed and scientific ecological values, include

- 1 Areas along the Mogollon Rim from the Blue Range to the Gila Wilderness (125,855 acres),
- 2 Freestanding wilderness candidate areas like Frisco Box and Eagle Peak, and
- 3 Buffer areas adjacent to the Aldo Leopold Wilderness

The legacy of Aldo Leopold is particularly important to all Americans who care about protecting and preserving the health of the Land for our grandchildren. We beseech you to honor his vision by modifying your management plan to place a higher priority on wilderness than on taxpayer-subsidized road construction and timber harvesting. Thank you.

Sincerely,

Roy Stephenson
Roy Stephenson
Executive Director

Han Shan Vision Quests
628 1/2 Camino de la Luz
Santa Fe, N M 87501

93-1

As a result of the comments received, demand projections and benefit values for sawtimber have been revised using more recent data. The result of the modified timber program is reflected in the Proposed Action Summary of Changes at the beginning of this document.

Along with the changes in allowable sale quantity, the projected road construction miles would also change significantly. The changes made in the modified Proposed Action Alternative are summarized in the Summary of Changes section located at the beginning of this document. We feel that these changes will result in a balanced use of the Forest's resources.

93-2

In your concern you mention several factors that you feel will be effected as a result of timber activities including erosion, damage to wildlife habitat, degradation of the region's water supply, and elimination of remaining unroaded areas.

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 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 ample 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 reduced over time, water quality should generally increase, 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 decline. Thus, timber harvest will actually increase the region's water supply rather than degrade that supply.

93-3

We have reevaluated our recommendation for the two wilderness study areas, and continue to support the nonwilderness recommendation. The rationale for this recommendation is summarized in the Summary of Changes section of this document.

93-4

Again, please refer to the Proposed Action Change Summary located at the beginning of this document for a discussion of the undeveloped areas on the Forest. Due to changes in the amount and location of timber harvest activities as well as changes made as a result of public concern, the modified Proposed Action Alternative more favorably addresses the concern that a significant portion of the undeveloped areas remain undeveloped for the duration of the 10 to 15 planning cycle.

LETTER 94

FOREST SERVICE RESPONSE TO LETTER 94

94-1

11/1/85 NM 87108

Oct 4, 1985 000 94

Forest Service, B. Lake, N. M.

2610 N. M.

Forest Service, B. Lake, N. M.

SAVED

OCT 07 '85

Dear Sir,

DATE RECEIVED

I am writing to you about the plan for the management of the forest. I would have to say that for your proposed plan (Alternative PA), if any change had to be made, I would have found Alternative E.

I never realized how much it took to manage a natural area, and how much compromise is needed. I am sure glad the Forest Service is good friends.

Cordell Jones,
Jim Corbett

Thank you for your comment. The purpose of the planning process was to develop an alternative that would best address the issues and concerns identified at the start of the planning process. Although Alternative E addresses the resolution of the range-wildlife conflict issue and provides for potentially less soil loss, it does not adequately address the issues of producing wood fiber and timber or the construction, operation, and maintenance of transportation facilities. Although much of the road construction is for the purpose of removing timber products, some of these roads are retained in the transportation system for administrative purposes or for use by other groups of forest users. In addition, timber sales provide for the maintenance of a portion of the transportation system which otherwise would require support from other resources thereby reducing the amount available for on the ground management.

LETTER 95

000 95

P O Box 681
Mesilla, New Mexico 88046
October 4, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

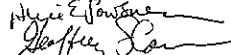
NATIONAL FOREST
OFFICE OF THE SUPERVISOR
SILVER CITY, NEW MEXICO
DATE RECEIVED

Dear Gila Forest Supervisor

We understand that the U S Forest Service, as required by law, has drafted a management plan for the Gila National Forest. We are writing to express our opposition to certain features of the plan, namely, the proposed increases in timber harvesting and the massive road building program that goes along with it. We believe this alternative to be uneconomically as well as damaging to other forest uses and values, and destructive of remaining wildlands. We prefer "Alternative F" over the Preferred Alternative."

We should also like to indicate that we support wilderness designation for the Lower San Francisco Canyon and Hell's Hole regions, two areas which the Forest Service plan recommends for non-wilderness use.

Sincerely,


Alice E. Powsner
Geoffrey Slavin

cc Senator Jeff Bingaman
Senator Pete Domenici
Congressman Joe Skeen
Governor Tony Anaya

FOREST SERVICE RESPONSE TO LETTER 95

95-1

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 harvest, as proposed in the modified Proposed Action Alternative, has been reduced. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of the revised timber program.

Along with the changes in allowable sale quantity, the projected road construction miles would also change significantly. A summary of the revised road program is also displayed in the Summary of Changes section of this document.

95-2

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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). These additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by looking solely at the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the process are considered, no meaningful conclusion can be reached.

95-3

Alternative F has the highest PKV, 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.

95-4

We have re-evaluated the recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale provided in the Summary of Changes section of this document.

LETTER 96

FOREST SERVICE RESPONSE TO LETTER 96

"IT IS TIME FOR ALL THOSE WHO BELIEVE IN THE VALIDITY OF THE INTANGIBLE
SPIRITUAL AND INSPIRATIONAL MESSAGE OF THE WILDERNESS TO STAND AND BE COUNTED".
- Ansel Adams

"THOUSANDS OF TIRED, NERVE-SHAKEN, OVER-CIVILIZED PEOPLE ARE BEGINNING
TO FIND OUT THAT GOING TO THE MOUNTAINS IS GOING HOME " John Muir

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 07 '85

DATE RECEIVED

Dear Sir-

I don't know you and you don't know me, but I know the Gila National
Forest intimately as I lived in Cliff and Gila in the 1970's and
explored that incredible wilderness area. It should be preserved
not just for our generation and for the people of New Mexico,
but for all the generations of Americans in the future.

I know the trees and the streams and the big game and all the creatures
and the marvelous variety of birds and all the many varieties of
plants that now inhabit that area...I know them well...and I want to
see them preserved for their own sake and for other humans to enjoy
and learn from.

All these living things are intertwined in a fragile ecology that
loggers, miners, and ranchers usually don't give a damn about unless
they are forced to.. and you are making decisions now about that ecology.

So far it appears that you are voting in favor of the powerful logging
interests and dragging your heels on any kind of wilderness preservation.

Perhaps that means in some way you are on their payroll. I am watching
your actions and am outraged at your turning down Alternative F and
in all ways being in the pocket of the logging and probably the mining interests.

Sincerely,

Jean Valentine
Jean Valentine
615 Acorn St., Belen, NM 87002

96-1

We have made several changes to the Proposed Action Alternative between the
draft and final. These changes include a reduction in the timber sale
quantity and road construction activities. We feel these changes have
resulted in a balanced site native that considered the needs of all of our
publics. We feel it is more successful at addressing the management needs
of the resources than Alternative F. For more information on the changes
made to the Proposed Action Alternative, we suggest you read the Summary of
Changes in the front of the public response document.

LETTER 97

FOREST SERVICE RESPONSE TO LETTER 97

5223 Santa Elena
El Paso, Texas 79932
October 4, 1985

000 97

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

107 85
DATE RECEIVED

Gentlemen

I have reviewed the Gila National Forest Draft Plan and Environmental Impact Statement and have many concerns about the preferred alternative and information presented/not presented in these documents

I have also read the comments made by the El Paso Regional Group of the Sierra Club and support their concerns and recommendations.

The range of alternatives is limited and, therefore, inadequate. The Gila is a large forest and the small number of alternatives, most of which are mandated by law or regulations and represent extremes, do not allow sufficient varying to provide for a wide range of inputs. The alternatives tend to be biased toward timber harvesting and livestock grazing and do not give adequate consideration to roadless areas, non-game wildlife, water shed protection, and other related issues.

Roadless areas identified during the RARE II process were completely ignored in the documents. Most of these lands are still roadless and should be considered for uses other than development. The possibility for designating these lands as Wilderness in the future should be considered and presented in various alternatives.

The two WSA's were superficially discussed and recommended for nonwilderness. These areas are unique and deserve wilderness status and should be reconsidered.

I have briefly outlined a few of my major concerns as well as supporting the comments made by the Sierra Club. If you take these concerns and recommendations into consideration in revising these documents, I believe that an environmentally sound plan, as envisioned by Congress in the National Forest Management Act, can be achieved.

Sincerely,


Thomas D. Brasfield

97-1

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. The number of alternatives to address issues and concerns are endless. The Proposed Action Alternative comes the closest to meeting all of the issues.

97-2

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. Please refer to the Proposed Action Changes Summary at the beginning of this document for more information concerning the undeveloped areas on the Forest.

97-3

We have reevaluated our recommendation on the two wilderness study areas, and continue to support the nonwilderness recommendation. Again refer to the Proposed Action Changes Summary for the rationale for this recommendation.

Law Offices of

Carl G. HorkowitzATTORNEY & COUNSELOR AT LAW
9101 DYER ST SUITE 202
EL PASO TEXAS 79924
(915) 755 2026

October 4, 1985

000 98

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, N M 88061RE Gila National Forest
Draft Plan

Dear Mr. Scoggin:

It has come to my attention that the draft management plan for the Gila National Forest, drawn pursuant to the National Forest Management Act of 1976, was issued in June of this year and that the Forest Service is considering public comment to Oct 8.

My understanding is that Alternative F, the more ecologically sound proposal has been rejected in favor of one proposing increased logging along with the roadbuilding necessary to accomodate logging crews and equipment.

As a frequent visitor to and concerned user of the Gila, I have great appreciation for its special beauty. I hike in the forest frequently and consider it worthy of careful protection.

One regret is that the legislation creating the wilderness areas did not include more of the forest. As a result, large areas deserving wilderness status are endangered by the prospect of further exploitation and spoliation.

It is this spectre of destruction which causes me to write.

The miners have shown what can be done. A hundred years after the mining ended, their debris is still easily found. The ground around Kingston, N M is littered with rusty equipment, pipes, car rails, cables, collapsed timbers, winching machinery. There are open mine shafts and adits. Cleared areas have not reforested or been reforested. Trees will not grow on the mining slag. All of it is ugly evidence of the little interest in preservation like so many children whose parents never taught simple dignity and respect for themselves or others, mining concerns took what they wanted and left what they brought, invoking the privileges of private land ownership to justify the ruin. The forest struggles to reclaim these sites. Now, the beer drinkers come on motorcycles and ATV's, drawn by curiosity for the old junk. In turn, they have things to leave discharged

batteries leaking acid, vehicle parts, lubricants' packaging, beer cans. These things can be found in good quantities, for instance, in the North Percha Creek Canyon. I've seen them there myself.

Last year I saw a new road being bladed on the steep north slope of the Mineral Creek Canyon. Here the new lack of vegetation will promote particularly rapid erosion and the consequent deterioration of the watershed. Sand and rock alone will not retain the water, which will run off quickly and cause flooding and, later, water shortages. Salt will be leached from the sand and contaminate the water.

98-1

Alternative F has the highest FIM, but it does not increase the alternative's ability 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.

You also expressed a concern relating to the level of timber harvest and road construction projected in the original Proposed Action Alternative. Because of these type of concerns, timber harvest has been reduced to a level equal to that needed at the Forest for the last 10 to 15 years (30 MMBF). Road construction has been reduced. Please see the Proposed Action Alternative Summary of Change located in the front of the public response document for a more complete description of these changes.

98-2

The road construction to which you refer was the restoration of an existing road. Erosion control structures (waterbars) were added to the road to help reduce erosion. The road was originally reconstructed approximately five years ago from a track road that has existed for several years prior to that time. The latest maintenance on the road has reduced the negative effects to the watershed rather than increase them as you suggest.

LETTER 98

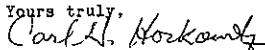
While erosion alone, brought on by both logging and roadbuilding, will reduce the areas fringing the wildernesses, eventually intruding upon the wildernesses themselves, the roadbuilding will also bring more refuse. The sides of Forest Route 152, for example, are strewn with beer cans, some of iron, others of aluminum, pull tops from food containers, more oil containers and bottles. In April of 1984, I collected several hundred such items from both sides of the route over a distance of about two miles. Some of these types of items will not disintegrate completely, under the elements, for over a hundred years. Rusty food cans and ammunition cartridges well over a hundred years old cover the ground at the old military camp at Ojo Caliente, north of Winston and just to east of the Gila. Metal detectors indicate a large dump beneath the surface. I've dug up lead mine balls buried a quarter of an inch down. They could have been placed there yesterday for all of the deterioration that they show.

None of this is worth tolerating. Further violence to the forest can be precluded. Wilderness areas need to be enlarged. Logging needs to be subordinated to preservation of the watershed, the scenery and recreation. What is lost now cannot be recovered in our lifetimes. The softwood timber of the Gila does not provide lumber of high quality. The economic value to the American public of its cutting has been called into question.

This is some of what can be done to preserve this special, quiet place.

- 1) Recommendation of Alternative F 4
- 2) Recommendation of wilderness designation for present WSA's 5
- 3) Recommendation of WSA protection for presently unprotected wilderness fringe areas 6

Your function as forest supervisor is important to the purpose of the conservationists. Thank you for your attention.

Yours truly,

 Carl G. Horkowitz

FOREST SERVICE RESPONSE TO LETTER 98

SE-3

A number of more specific comments have been received relating to the economics of timber harvesting. Please see our response to the CTEC report (Letter 001-CHEC) for a discussion of several aspects of the economics of timber harvest.

SE-4

See response to your comment #2.

SE-5

We re-evaluated our nonwilderness recommendation for the two wilderness areas and continue to support the nonwilderness recommendation. Our rationale for this decision is included in the Proposed Action Alternative Change Summary located in the front of the public response document.

SE-6

Because of changes made to the Proposed Action Alternative, only three percent of the presently undeveloped acreage on the Forest would be developed in the first 10 years. The areas that remain undeveloped will be managed to maintain semi-primitive recreation opportunities and will be reconsidered for wilderness when the Plan is revised in 10 to 15 years. A list of the undeveloped areas and the portions affected by development activities is included in the Proposed Action Alternative Change Summary.

99-1

Wildlife benefit values used in the model are higher than those used for grazing. The values used for grazing and for wildlife represent a willingness to pay value not a return to the government. The actual cost of administering the range program is in excess of the funds taken in from grazing fees. This requires additional funds from the national budget to sustain the grazing program which is a single use of the National Forest. The additional funds needed for grazing and for other uses including wildlife are supported by the public but the benefits from grazing are primarily to the permittee. Funding is constrained to the 1980 level, and the demands for resources keep increasing. We too are concerned about the national budget and the way we spend funds as supported by our analysis and allocation of resources in the most cost effective manner.

99-2

We agree that should livestock grazing be eliminated from Management Unit 7C there would be a reduction in the deer population. Livestock are currently keeping the herbaceous and the browse components in a low seral stage of development which is positive to deer habitat. However, activities that keep plants in a low seral stage, and maintaining productivity must be analyzed and watched closely to prevent actual plant loss from over use. The actual permitted numbers for livestock must, however, be balanced with other competing uses at a level that can sustain the forage component and address all resource needs. A review of the projected livestock adjustments scheduled for Management Area 7G showed a need to shift competing use in favor of deer and the need to increase the overall benefiting impacts of grazing in the Management Area. This resulted in a projected reduction in AUM's of 23 percent; down from those projected in the draft. The final adjustment will be determined through a current updated allotment analysis.

99-3

We agree that different interpretations of multiple use are possible. Each special interest group interprets multiple use in a way which favors their own interest. Livestock permittees' special interest is livestock populations and it is natural they would interpret multiple use to favor livestock populations. The Forest Service 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 or emphasis, maximizing one resource at the expense of others, or that all resources will receive equal attention on every acre of land in the National Forest 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 livestock as important as other resources. Every prescription contained in the Forest planning model was an integrated multiple use prescription which considers all resources including livestock. Prescriptions in the Forest Plan contain standards and guidelines for the integration of all resources.

000 99

ORIGINAL FILED
SILVER CITY NM / MEXICO
OCT 07 85
DATE RECEIVED

October 4, 1985

Kenneth C. Scoggin, Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin:

I am a permittee and will be adversely affected by this plan so naturally I am opposed to it.

Here are some of my reasons for being opposed:

1. This plan definitely favors wildlife over grazing. In talking with forest personnel I was told that they could get more money from wildlife than grazing but this comes from the national budget which is already in trouble and will increase taxes. I oppose this.
2. The reduction of 50% and on some 60% in AUMs will result in what is left in the area not being profitable to manage. As what you're really proposing is 100% reduction. When this is accomplished the wildlife will be reduced to the level that is now in Tepee Canyon, Gobbler Canyon, McKenna Park, and South Fork of Mogollon. The cattle were completely removed from this area in the 1930's and very few years afterward the deer population dwindled and has never returned. In management area 7G there is a sizeable deer herd at this time.
3. I am in favor of multiple use, and this plan is against this.

4 There is many more plans that have not been given any consideration

5 Some of the information in this plan is completely false And let me point out an example Page 245 of proposed plan T and Z Species with in this area include Wildlife Bald Eagle, Black Hawk, and Coatimundi My family has been here 101 years Never has any of us seen a coatimundi here, on the 7G management area I asked forest service personnel and they told me that no one had seen one and no reported trapping had been made

6 I disagree with the funding for allotments proposed in this plan

7 With the increase of WAUM, the impact to private land if this is accomplished, which joins forest land has not been considered, nor has any provision for repayment been made In the 1950's the Forest Service and Game department introduced elk into this area They didn't stay on USFS land They are on private lands and if this was a permittee some one would be in trespass

8 In my opinion and being familiar with several of these management areas there is NO consistency in reduction or increases This to me is unfair It looks to me that the permittees who are on and join the wilderness area, in this plan, are being cut more than those not joining the wilderness

In my years of being a permittee and working with the different range men and rangers I am proud of the good working relationship that we have had I think that our record on the forest is a good one, and this can be proved by past and present forest personnel But I am against this proposal and think it should be done away with and a new proposal be submitted

Respectfully

[Signature]
Rolland R Rice

trr

99-4

We agree. The number of alternatives to address the issues and management concerns are endless. The alternative selected does come the closest to meeting all of the issues.

99-5

Management Area 7G contains the upper water tributary for the Gila River. Coatimundi have been trapped in the lower Gila River. Their existence is so scarce that they were suspected of being in Management Area 7G. In as much as Coatimundi have not been seen in Management Area 7G by Forest Service personnel and as evident by your comment, none have been seen by your family, Coatimundi have been deleted from the T & E listing found in Management Unit 7G of the Forest Plan.

99-6

Funding for individual allotments is not covered in the Forest Plan. This determination will be made by the district ranger based on the approved allotment management plan.

99-7

Based on your personal input into the draft Plan and consultation with the New Mexico Game and Fish Department, we have altered the projected wildlife increases to account for wildlife impacts to private lands. The management emphasis will be on increasing deer and not on elk. The proposed increase in wildlife habitat will primarily affect riparian zones away from the private lands. WAUMs are projected to increase 481 (a 16 percent increase) over current outputs. This increase is relatively small but the current wildlife numbers are currently high.

99-8

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 on adjacent nonwilderness allotments simply because they are classified wilderness. Procedures used to evaluate livestock impacts remain the same inside as outside the wilderness area. When comparing stocking rates prior to wilderness classification and those of today, we find the rates to be relatively close. A review of the Plan indicates that the number of management areas requiring a reduction in stocking (non wilderness and wilderness management areas) are equal at 10 areas each. Wilderness classification is present on 45 percent of all management areas on the Gila National Forest.

99-9

Forest Plans and the allocation of resources is always a concern and one that will not go away soon. We too are proud of the working relationship we have with the permittees and the benefits that result from this relationship. The draft Plan provided an opportunity for public input. Adjustment have been made based on these comments. It is our goal in forest planning to provide direction but it is not practical to think some revisions will not be necessary in time.

000100

APR 3, 1985

Ken Martin, Gila Forest Supervisor
Silver City Ranger Dist.
P.O. Box 2748, Hwy. 190 S.
Silver City, N.M. 88531

NATIONAL FOREST
SILVER CITY, NEW MEXICO

APR 07 '85

Dear Mr. Supervisor:

DATE RECEIVED

During a recent trip to New Mexico I was very distressed to learn of the U.S. Forest Service draft management plan concerning the Gila National Forest. If this disastrous plan is implemented, 1500 miles of additional roads would be built, opening up the forest for further timber harvesting and development. I feel that I must protest this reckless exploitation of our fragile forest ecology for dubious short-term gains. In our increasingly urbanized and technological society, there are fewer and fewer wild places left. Surely the public interest would be better served by leaving the forest alone, instead of considering it merely as a source for a number of board feet.

I would also like to express my opposition to using the forest for cattle grazing. I appreciate the fact that there are no cows around the cliff dwellings, and would like to see grazing eliminated in other areas. It ruins the "wilderness experience" to come across a herd of cattle fouling the streams and causing incalculable erosion damage.

Although I live in Austin, my family and I are fortunate enough to own property near the Gila National Forest, and we vacation there frequently. I cannot bear to think of this beautiful place that I love being ruined for future generations. If we let the needs of timber cutters and cows take precedence over the public's need for an unspoiled recreation area, someday there won't be any forest left for anyone.

Thank you for the opportunity to express my opinion.

Sincerely,
Luzanne Freester
1000 E. Austin Rd.
Austin, TX 78745

100-1

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 Proposed Action Change Summary of the beginning of this document for details concerning the timber program proposed in the final Plan.

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 1,450 miles of roads over 50 years. The modified Proposed Action Alternative projected construction of approximately 620 miles of roads, or a 57 percent reduction in projected five decade road construction. There would be a reduction of approximately 20% 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, or approximately 65 percent of the roads constructed.

100-2

The grazing of cattle has been considered to be a legitimate use of public land since the inception of the Forest Service. Although past overgrazing has contributed to erosion in some areas this is not a problem in all cases. Some watersheds are in unsatisfactory condition due to the inability of the soil to produce sufficient vegetation to protect the site. These low productivity soils will seldom produce enough forage to be considered effective grazing land. It is inaccurate to assume all erosion problems are the result of cattle grazing.

LETTER 101

JOHN M CROWL
FORESTER

000101

MEMBER
ASSOCIATION OF CONSERVING FORESTERS
SOCIETY OF AMERICAN FORESTERS

1025 BEAN DRIVE
MADISONVILLE KY 42401
TELEPHONE 801 3370

JOHN M CROWL
P O Box 231
El Prado, NM 87529
11-27-85

Supervisor, Col. A.

I agree with
the Sierra Club
on items mentioned
in the attachment.

My old friend
who helped to build
the Northern - I mean
of the Forest Service
ideas!!

Sincerely
John M Crowl
41 years
a Forester
Public & Private

FOREST SERVICE RESPONSE TO LETTER 101

101-1

For the responses that would appear to address your concerns, please refer
to the responses to letter 011 (El Paso Sierra Club)



EL PASO REGIONAL GROUP

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

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061
(505) 388-8201

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, Gila Forest Planning Response Co-ord., Rio Grande Sierra Club

LETTER 102

Cila, New Mexico
4 October 1985

000102

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

01/07/85

DATE RECEIVED

Dear Mr. Scoggin:

I am writing this letter in protest of the Cila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan. I have looked at it as objectively as possible, but can't see where the livestock industry has given a fair shake. They have contributed in many ways to the positive effects of the Cila National Forest. It is time that their interests should be considered.

They have to become protectors of the land if they are to stay in the livestock business. Water has to be provided for the cattle and any time water is improved or developed, the wildlife benefit. In times of drought when supplemental feed is necessary, the wildlife benefit from this as well as the cattle. As the cattle naturally rotate the deer follow the cattle and are killed along with the cattle. As the predators are controlled by the owners of the livestock, the wildlife benefit even more so than the livestock as the predators prefer to eat upon the wildlife. In recent years the ranchers have had very little assistance with this problem.

This is a semi-arid region and the rainfall will never be enough to the point that we can compare it to in areas that receive more rainfall. The places that the data was collected from were habitable from the ranchers point of view. All of them I have seen are close to a water or across a natural bedding ground where the grass is naturally used more than other areas. The data was not collected from a fair cross-section of the permit.

The cattle numbers have been reduced through the years until there is no further need to reduce the numbers that are on the Cila National Forest today. As they are reduced this affects the tax base of Grant and Catron County. It will also reduce the revenue the county and the schools receive from the sales generated on the Cila National Forest.

There are many, many other points that should be considered in this matter and I believe this plan should be scrapped and one put into effect that is not as one-sided as this one is.

Sincerely,

Donald Hooker

Donald Hooker

FOREST SERVICE RESPONSE TO LETTER 102

102-1

Due to the interrelationship between cattle and livestock, it is impossible to separate the benefits wildlife derive from the activities of livestock operators. We agree that some species of wildlife utilize salt and supplemental feed provided by the rancher. In addition, predator control provided by the rancher is beneficial to wildlife. Forest Service policy, past and present, is to cooperate with these agencies to keep predator populations within acceptable limits.

102-2

The collection of data to establish stocking rates involves several processes. Some are long range studies and involve the use of permanent transects. These studies are used to measure changes in plant density, species composition, and plant vigor. These transects are located in representative areas normally used by livestock. Much of the data regarding composition and density is derived from paced transects scattered throughout the vegetative types present in the allotment. To determine stocking rates the productive potential of the soil must also be considered. In addition, different plant communities may have quite varied responses when subjected to grazing use. It is through the combination of information produced by these processes and studies that stocking rates are determined. The ultimate objective is to permit the removal of forage while maintaining the various plant communities in a healthy state.

102-3

It is agreed that any reduction in the commodity resources could result in reduction of the tax base and income for associated counties. The monies generated to counties is also affected by the fluctuations in the demand in the various markets. It is not likely that the Proposed Action Alternative will result in a significant change in these monies. In either case, this does not relinquish our responsibility to develop a plan that best balances the commodity and amenity values.

LETTER 103

FOREST SERVICE RESPONSE TO LETTER 103

000103

Oct. 4, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico
88061

Dear Forest Supervisor,

I would like to respond to the Gila National Forest Draft Plan. As a former professional guide I have spent a lot of time in several of the wilderness areas in the state. It is my opinion that to preserve the environmental integrity of New Mexico there must be adequate wilderness acreage set aside. I feel that the two Wilderness Study Areas should be included as Wilderness in the Draft Plan recommendation.

The Gila National Forest is perhaps the most important National Forest in the State. I believe that Alternative F should have been selected to preserve the integrity of the Gila from overuse because of logging.

Thank you for the opportunity to comment. I hope there will be reconsideration to include wilderness areas and to protect the Gila through Alternative F.

Sincerely,

John Wright

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 07 '85

DATE RECEIVED

John Wright 7311 Coors S.W. #7 Albuquerque, New Mexico 87105

103-1

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Change Summary at the beginning of this document for the rationale supporting this decision.

103-2

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 the modified Proposed Action Alternative provides better overall net public benefits than Alternative F.

LETTER 104

FOREST SERVICE RESPONSE TO LETTER 104

000104

Terrve B. Gregory
12408 Morocco NE
Albuquerque, NM 87111

Forest Supervisor
Gila National Forest
2610 N. Silver St.
Silver City, NM 88061

U.S. NATIONAL FOREST
Silver City, NM

OCT 07 '85

DATE RECEIVED

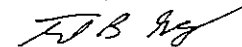
Dear Sir/Madam:

I have hiked and camped all over the United States and Canada for many years and there are very few spots as lovely as some of those in the Gila National Forest.

It concerns me that such a beautiful area is being threatened -- that Alternative F has not been selected as part of the Forest Service plan, that the emphasis seems to be on more logging (and road building), and that prime candidates for Wilderness designation have not been recommended. There simply are not many areas left in the U.S. as unadulterated.

We are selling ourselves and the future short by degrading such an area for short term economic gain. I hope you will reconsider the Gila National Forest Draft Plan and its impact on our fragile southwestern environment.

Sincerely,


Terrve B. Gregory

104-1

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.

104-2

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. As a result, the sawtimber volume of 30MMBF is projected for the first decade.

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, a 57 percent reduction in projected five decade road construction. Please refer to the Proposed Action Change Summary at the beginning of this document for details concerning the proposed timber program.

104-3

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. Again, refer to the Proposed Action Change Summary at the beginning of this document for details concerning the unroaded areas of the Forest.

LETTER 105

FOREST SERVICE RESPONSE TO LETTER 105

000105

729 Jefferson NE
Albuquerque, NM 87110

October 3, 1985

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, NM 88061

Dear Sir

This letter responds to the Gila National Forest Draft Plan and Environmental Impact Statement per the review process for the citizens of New Mexico

We oppose the proposed alternative. The plan calls for a large increase in timber harvests and a massive road building program that would severely threaten critical roadless lands and multiple use resources.] 1

Allowing such an increase in timber harvesting would threaten not only the unique wilderness areas and varied flora and fauna habitats, but would also threaten the watershed through increased erosion. Such short-sighted bad planning is costly, given the uneconomical aspects of timber harvesting both in the Gila area and in general. Building new access roads to accomplish this vast increase in timbering would disturb many wilderness areas currently used for hiking, camping, hunting and fishing.] 2] 3

RECEIVED
OCT 07 '85
DATE RECEIVED

105-1

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 Forest Management Team has reexamined the original projection considering the timber sold in recent years and does not feel the projection of an increased demand over time is warranted. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of the modified timber program.

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 800 miles of roads, a 47 percent reduction in projected five decade road construction. 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.

105-2

Soil loss from logging is controlled by the use of Best Management Practices determined through the State 208 water quality planning efforts. 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 due to the fact that the fire consumes its duff debris, and litter leaving 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 seeded to afford additional protection.

105-3

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated solely from reviewing the dollars received from stumpage. Road construction is one of the major factors affecting the advertised stumpage rate. Road construction and reconstruction can be utilized for other purposes than providing access for sawlog harvest. If needed in the overall transportation plan, some of these roads may be retained to improve administrative efficiency or increase recreational opportunity. These are additional values that are derived from the sale program which are not considered in the appraisal process.

LETTER 105

Reforesting the Gila, which in many places is steep and erodible, will be difficult and costly. Resulting soil loss will damage the water supply, the vegetation, and disturb the wildlife.] 4

Allowing timbering and roads on some of the spectacular wilderness areas will eliminate these areas from consideration for wilderness designation. How sad to think that such short-sighted planning would result in the permanent loss of some of New Mexico's finest wilderness areas. We support protection of current roadless areas as the best use for the Gila, rather than embarrassingly cost ineffective timbering.

We also support wilderness designation for both the Lower San Francisco Canyon (6700 acres) and Hells Hole (19,000 acres). In addition, we urge the forest supervisor to manage Mogollon Rim (from Blue Range to the Gila Wilderness), Friaco Box, Eagle Peak, and areas adjacent to the Aldo Leopold Wilderness as semi-primitive, non-motorized recreation. Retaining these areas for ecological study, recreation, wildlife habitat and watershed protection far exceed non-profitable harvesting of timber and building of destructive roads.] 5

We urge you to reconsider your preferred alternative and to select an alternative both economically sound and capable of serving the best public interest with multiple uses, rather than serving a few destructive timber harvesters.] 6

Sincerely,

Merri Rudd

Mark Justice Hinton

FOREST SERVICE RESPONSE TO LETTER 105

105-4

In your concern you mention several factors that you feel will be effective as a result of timber activities. These include erosion (discussed above), damage to wildlife habitat, and the degradation of the region's water supply.

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, 14 percent reduction in old growth habitat. This should provide ample habitat for wildlife that requires high seral stage timber forest. 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 decline 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 degrade that supply.

105-5

We have reevaluated our recommendation on the two wilderness study areas and continue to support the non-wilderness recommendation based on the rationale described in the Proposed Action Change Summary located at the beginning of this document.

105-6

Of the approximately 629,000 undeveloped acres outside of the classified wildernesses, approximately 2,000 acres will be affected by development activities in the first decade. These areas are being entered to provide for non-wilderness resource outputs. Again, refer to the Proposed Action Change Summary at the beginning of this document for details concerning the undeveloped areas of the Forest.

000106

FOREST SUPERVISOR
Gila National Forest
Silver City, NM

11040 BURROWS
P.O. Box 337 UTEP
El Paso, TX 79968

OCT 01 '85

DATE WRITTEN

Dear Supervisor:

I am writing to inform you of my opposition to the Gila National Forest Draft Plan of June 1985.

The "Gila" is a jewel. For people living in West Texas and Southern New Mexico, it is often the closest and most desirable retreat. The local economies are supported by tourist dollars.

If you are going to approve the draft plan you might as well write the entire "Gila" and Black Kinge off. The forests are marginal at best at lower elevations and the "soils" are derived from volcanic rocks. Approving logging will bring our nation's first wilderness that much closer to destruction.

Instead, I hope you will enlarge the Gila and Aldo Leopold wilderness areas, and protect them by restricting commercial activities in the fragile "buffer" areas that surround the wilderness. This will preserve the precious riparian habitat and protect the fragile soil.

Sincerely,

Aloyd Burrows

106-1

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. As a result of comments received, demand projections and benefit values have been revised using more recent data. This has resulted in a modification of the proposed timber program for the Forest. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information regarding the proposed timber program.

106-2

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, some on the fringe of existing classified wilderness area. Additional information concerning the proposal for the undeveloped areas is also available in the Proposed Action Change Summary section of this document.

LETTER 107

FOREST SERVICE RESPONSE TO LETTER 107

000107

Dear Forest Supervisor,

I'm writing this letter in opposition to the proposed Gila National Forest management plan. I truly believe the "preferred alternative" is only taking into consideration the timber industry, which is in my opinion an uneconomic program. You should also take into consideration the destructive impact of the roads needed to make this proposal feasible, on our wildlands. I don't agree with any of the proposed plans because I think they need to be reworked with wildlife and its habitat in mind. Although if one of the proposals was accepted, I should be "Alternative F" because it takes into consideration wildlife, wildlife habitat and dispersed and developed recreation.

I would also like to see both the San Francisco and Gila Rivers designated as wild and scenic rivers; and the Hells Hole and the Lower San Francisco Canyon as wilderness.

A NATIONAL FOREST
of the United States

OCT 07 '95

DATE RECEIVED

Yours Truly

Angel B Montoya, 726 Shindley
Las Cruces New Mexico 88901

107-1

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 25 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.

107-2

We disagree. In the preparation of the various alternatives wildlife and wildlife habitat was considered. Manipulating the allocation to various resources and amenities results in varying outputs for wildlife and wildlife habitat in each of the alternatives.

107-3

Alternative F, as stated, has the highest PMV, benefits, and E/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 public benefits than Alternative F.

107-4

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 see 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 results of this evaluation are presented in the Proposed Act on Change Summary located at the beginning of this document.

107-5

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Change Summary at the beginning of this document for the rationale concerning this recommendation.

LETTER 108

FOREST SERVICE RESPONSE TO LETTER 108

000108

October 3, 1985

Ken Scoggins
Supervisor
Gila National Forest
2610 Silver
Silver City, N M 88061

Dear Ken

Here are some comments I wish to make concerning the
"Proposed Gila National Forest Plan"

Page 186, Management Area 6B - Reserve Ranger District,
6 grazing allotments Cox Canyon, Deadman, Y Canyon, O Bar O,
T Bar and Corner Mountain

The Forest Plan states Wildlife use will increase in the
range of 26% above current level of 5141 WAUMS. Using this
5141 WAUMS, this figures to 428 head of wildlife. If this number
refers to deer only and this survey was done in 1980, that could
be correct. But in 1980 we had about 1000 head of elk and
antelope combined in this area. By now, 1985, we have at least
1500 elk and antelope combined. I personally have counted about
83 head of elk by the road in an area of 1/2 mile distance and there
were more in the timber that I couldn't count. This was about
1 mile east of Collins Park. I've counted 65 head of elk at one
watering tank on the Cox Canyon Allotment, and counted 45 in the
Horse Pasture on Deadman Allotment.

Page 195, same management area, it states "Prescribed fire will
be used to reduce natural fuels on 4000 acres per decade." This
management area contains 249,267 acres. Burning 400 acres per year
is not enough burning to make a dent in the underbrush and forest
litter that already exists, not to mention what will accumulate
over the next decade. More prescribed burning should be done on
more than 4000 acres per decade. I believe that prescribed burning
and letting lightning fires burn will add more AUMS or WAUMS to a
given area than any other method and at less expense.

I was looking forward to our permittee meeting with you to
discuss this plan but I have been on jury duty all week and will
not be able to attend the meeting. I did attend the meeting at
Luna that Dick Cooke arranged for October 1st.

Sincerely,

H B Birmingham

H B BIRMINGHAM, JR
P O Box 586

108-1

As a result of public input to the Proposed Plan, we have had the district
personnel contact permittees to update and verify wildlife populations.
These revised figures were used in the final Forest Plan.

108-2

We agree. Approximately 81,623 acres within this management area are
classified as tentatively suitable timber. To complete burning of the
entire area at the rate indicated in the Plan would take eight decades;
however, with the manpower and budget constraints expected, it was our
opinion that the levels identified in the Plan were all that could
reasonably be accomplished. This same problem exists in many management
areas. To increase the burning program would require reducing some other
activity or activities identified in the Plan.

LETTER 109

FOREST SERVICE RESPONSE TO LETTER 109

000109

No response needed.

RE Gila National Forest Management Plan

Oct 3, 1985

USDA Forest Service
Gila National Forest
2610 N. Silver St.
Silver City, New Mexico

RECEIVED
OCT 11 1985
DATE RECEIVED

Dear Sir

I recently submitted a hand written letter of comments
about the Gila National Forest Management Plan and
Environmental Impact Statement, dated September 30, 1985.

I did not however give my name on the letter or
on the document and state I am a permittee on the Forest.
My name however was listed on the return address of the envelope.

Sincerely,
Lamar Reynolds
103 N. Center
Silver City, N.M.
88301

LETTER 110

FOREST SERVICE RESPONSE TO LETTER 110

3957 Westview
Las Cruces, N.M.
88005

000110

ALA 10/11/85
10/11/85

OCT 07 '85

DATE 10/07/85

Forest Supervisor
Gila National Forest
2610 N. Silver St
Silver City, N.M.
88061

Dear Sir:

I have read the Gila Forest Management Plan EIS and there are several issues in the Proposed Alternative that I find unacceptable.

Regarding produce timber, the Proposed Alternative must allow significant steep slope logging to meet projected needs. First, I find the projected needs too high and appear to be values used 10-15 years ago. More current projected timber needs are considerably lower. Also by admission of the Forest Service steep slope logging causes severe degradation of the environment. We cannot allow such severe damage to occur because of inflated projected needs. Timber sales must be reduced to prevent any steep slope logging.

Range grazing is another area I find questionable. Again the projected needs appear highly inflated. It appears that the need for beef for our livestock will go down, not up. This is due to higher grazing fees (which are still far too low), which will make all the marginal operations obsolete. There are more efficient and effective areas to raise cattle than in the west. Perhaps the most ecologically important part of Western Forests is the riparian areas. The Proposed Alternative provides for "slight" improvement in riparian areas. These areas are currently in such an extremely poor condition that only "slight" improvement is totally unthinkable.

The proposed alternative also allows for increased ORV use which seems inconsistent with closing of timber roads. It would appear that the closed timber roads would be prime ORV areas of use which means the roads won't be closed at all. The increase in ORV use which is so detrimental to the environment is unacceptable. The vehicles must be confined and their use reduced.

110-1

In response to public comment, timber values were recalculated. This resulted in the value assigned to timber being lowered. Utilizing these new values, sawlog harvest in the revised Plan decreases during the first decade from 35 MMBF to 30 MMBF. This level of harvest is projected to remain static through time. This level of harvest is equal to the average amount that has been sold on the Forest in the last 10 to 15 years and is 45 percent below the existing allowable sale quantity. Demand estimates for timber from the Forest have been revised and are now considered to be flat at the 30 MMBF level. Nationally, demand is still expected to increase.

110-2

There is no reference in the Plan that indicates that steep slope logging causes severe degradation of the environment. Using proper controls, cable logging of steep slopes results in less soil disturbance than the conventional method of tractor logging. Benefits associated with logging of steep slopes include creating a diversity of habitat for wildlife and maintaining the timber resource in a healthy growing condition.

110-3

There may be more effective or efficient places to raise cattle than the Gila National Forest; however, livestock grazing is a legitimate use of National Forest lands and there continues to be a demand for this type of use as evidenced by the continual transfer of permits. It may be true that higher grazing fees may eliminate the marginal operations. If this should happen, the areas would be re-analyzed and the resource reallocated.

110-4

The Plan recognizes the importance of riparian habitat. Where cattle use is contributing to site deterioration, the Plan proposes to address the situation through changes in grazing methods and/or control of livestock through fencing. Utilizing these methods will allow these sites to improve and increase plant diversity; however, the recovery process to return these sites to good condition with proper plant diversity is slow.

In order to clarify our intent as it related to the management of riparian areas, several Forestwide Standards and Guidelines have been added. In addition, the riparian environmental effects section in the Environmental Impact Statement has been revised. The standards and guidelines that have been added are included in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

110-5

The definition of ORV includes not only conventional four-wheeled vehicles but also trail bikes, three wheelers, and so forth. The closure of timber sale roads will eliminate the use by conventional vehicles but these closed roads may receive some use by trail bikes and three wheelers. The latter can cause damage if use is concentrated in a given area; however, the lightweight vehicles tend to cause less vegetative impact and soil disturbance than conventional 4-wheel ORV's. Historically, ORV use of the Forest has not been heavy and has generally not been concentrated. ORV use is recognized as a form of recreational experience. The Plan addresses this issue by permitting this type of use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

It is abundantly clear that the proposed alternative caters to the groups that pay the bills - Timber and Grazing. I believe that it is time that all users of the forest pay - according to their impact. That is, hikers and backpackers would pay less than those using developed campgrounds and those doing greater damage (ORV, Grazing etc) would pay much more.

More specifically for the Gila National Forest I would prefer to see much more of it managed as a wilderness. It has all the classic qualities of a wilderness. First, the north star road should be closed to join the Gila and Aldo Leopold wilderness areas. Adjacent lands to these two areas should be included in the wilderness designation. Additionally, in the Mogollon mountains, Tuleosa mountains and the Blue Ridge/San Francisco area extending into Arizona should all be designated wilderness.

Even your most progressive alternative - Alternative F falls far short of what the Gila National Forest really needs. I would therefore give my support to the Alternative proposed by Earth First! It is the most sound and comprehensive I've seen.

Thank you for your time

Sincerely,
Kathleen LaFramboise

110-6

The modified Proposed Action Alternative does not cater to the groups that pay the bills. Under this alternative, grazing will actually decrease and

timber will remain at a level that is equal to the past 10 to 15 year average sawlog harvest. Charging user fees for other types of uses such as recreation is a national issue and is not within the scope of this Plan. The value received for sawtimber is derived through the competitive bidding process. The amount received for grazing fees is determined by congress, and we therefore have no authority to adjust them.

110-7

Closing the North Star Road is beyond the scope of this Plan. The North Star Road is a New Mexico State Highway (NM 61). It is not within the jurisdiction of the Forest Service to close this road. The road is an important direct access to the northeastern portion of the Forest from the southern part of the Forest. This results in administrative savings by reducing the time and distance traveled and also provides a direct access for recreationists wishing to use this part of the Forest.

110-8

Of the approximately 688,000 undeveloped acres outside of the classified wildernesses, approximately 2,000 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. The development effects on specific areas is shown in the Proposed Action Alternative Summary of Changes.

LETTER 111

FOREST SERVICE RESPONSE TO LETTER 111

000111

P.O. Box 497
Reserve, New Mexico 87830
October 3, 1985

U.S. Forest Service
2610 N. Silver Street
Silver City, New Mexico 88061

NATIONAL FOREST
New Mexico

Oct 07 '85

DATE RECEIVED

Dear Sirs:

Following are my comments regarding your long range plan:

First it is a blatant disregard for effective use of taxpayer dollars. I doubt if you can find any congressman who wanted such a waste.] 1

It is a guide for range-sons, and assistants to establish stocking rates for livestock and mis-direct Range Betterment funds without leaving their offices.] 2

My comments are based on 27 years experience operating the Eagle Peak permit, area 6C. The ranch has been in our family for over 100 years. We provided the money a little at a time to build the fences and water developments. If grazing fees were still 50 cents a month we could replace barbed wire as it rusts and repair tank borders when they wash away. But it now takes dollars from outside sources to pay the ranch expenses.

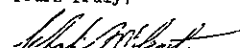
I have spent this 27 years waiting for a management plan that has never been written. Beside doing all I can to maintain and improve the ranch, I am paying 50% of my grazing fees to you to spend somewhere else.

If I had control of my own funds I could do a better job of managing them. It wouldn't be anything spectacular in any one year. But even a little bit beats nothing.

You think you must push ranches off the Forest to satisfy Wildlife and Recreation interests. You should tell the truth in some of the brochures that hang in Forest Service offices. When the rancher's contribution of water, salt, predator control, and forage management are gone you are going to have a non-productive wasteland that won't produce revenue or sustain Wildlife.] 3

The only good thing I find in your plan is the use of fire for brush control.

Yours Truly,


Charlie McCarty

111-1

We disagree. Without the analysis and the integration of all resources provided by Forest Planning, it would be impossible to manage an area the size of the Gila National Forest with any degree of effectiveness. To properly allocate resources and schedule outputs will be possible with the direction provided by the Forest Plan. Because of the level of demand placed on the forest resources, some compromise will be required. The cost of planning should not be viewed as a waste. To not plan would result in a much greater waste.

111-2

The Forest Plan addresses the management direction and the emphasis for each management area. The site specific activities to accomplish the management emphasis will be accomplished on the ground. Stocking rates and placement of range betterment funds will continue to be determined through joint cooperation between the permittee and the Forest Service using data collected in the range allotment analysis.

111-3

Livestock management, along with other uses of the National Forest will be blended together to provide for a growing public. It is not the intent of the Forest Plan to push ranchers off the Forest but to provide direction for future management. It provides the rancher with information needed to plan for the future as well as to provide an awareness of others activities that are planned for each management area in the Forest.

It becomes necessary in the administration of the National Forest to consider the cost of doing business in conjunction with the ability of the land to support the goods and services demanded by the public. Some lands lend themselves to high recreational use while other lend themselves to livestock grazing with a minimal cost and conflict to other use and activities. It is these decisions and allocations that must be made to insure productive and economical management of the Forest. The contribution and cooperation by permittees to forest management is appreciated and necessary to the overall productivity of the Forest.

LETTER 112

FOREST SERVICE RESPONSE TO LETTER 112

8552 Baron Dr
Huron IA 57923

October 3, 1985

Hennrich Seaguy II, Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000112

U.S. NATIONAL
FOREST SERVICE

OCT 07 '85

DATE RECEIVED

Dear Sir

Thank you for the opportunity to review the Gila
National Forest Proposed Plan and EIS. It is
evident that you and your staff have done a tremendous
amount of work.

I have studied the alternatives and I find
Alternative F to be the most desirable. I have several
reservations for this preference. I feel that protection of
natural resources such as wildlife, clean water and
healthy ecosystems should be given highest priority on
National Forests. Alternative F also makes good economic
sense; it has the highest PNW and, more important I think,
the highest B/C ratio. Most of Silver Mexico is in
private ownership and will not be managed for amenity
values. The National Forests belong to all present and future
Americans so they should be managed to preserve some of
what was here before the white man came.

Thank you for considering my comments.

Sincerely,

W. L. Smith

112-1

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 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 WILDERNESS SOCIETY

October 3, 1985

Sotero Muniz
Regional Forester
U S Forest Service
517 Gold Ave , S W
Albuquerque, N M 87102

CEA
2012 f
OCT 07 '85
DATE RECEIVED

000113

Dear Mr. Muniz

Justin Ward and I appreciated the opportunity to have lunch last month and get acquainted. As we discussed, the Wilderness Society has recently opened an office in Phoenix to cover New Mexico and Arizona issues and will be giving special attention to forest planning. I have passed on to Jim Norton, our Southwest Regional Director, your interest in working with the conservation community and expect that he will visit on one of his next trips to Albuquerque.

Enclosed are comments on the draft Gila plan from the Sierra Club and the Wilderness Society. As we discussed at lunch, your decisions on forest plans may well be the most important and lasting way that you leave an imprint on the Southwest as Regional Forester. In this connection I urge you to take the time to read these comments, including Mr. O'Toole's report. The draft Gila plan is heavily imbalanced towards timbering and roading at the great expense of a natural diversity of wildlife, water quality and fish, primitive recreation, visual values and cultural resources. The preferred alternative makes little economic sense and is rife with legal infirmities.

I urge you to direct the forest staff to propose an alternative with a more balanced mix of multiple uses. Further, as we discussed, I am enclosing the cover sheet of a recent memo from Region 6 that directs that released roadless areas be each considered for no development in various alternatives. I commend this approach to you and John Russell for your use.

Sincerely,

Peter C. Kirby
Senior Counsel
Resources, Planning and
Economics Department

cc John W. Russell, Planning
Kenneth C. Scoggin, Gila National Forest ✓

1400 EYE STREET N.W. WASHINGTON D.C. 20005

LETTER 114

FOREST SERVICE RESPONSE TO LETTER 114

Tucson General Hospital
Committed to caring
JOHN T. WINTER, D.O.



DATE RECEIVED
OCT 07 '85

000114

Oct 4, 1985

Dear Sir,

STOP! The National Forest Service
has lost its way! It is time the NFS became
an agency of the people instead of an agency
of the industry. You can help stop this
destructive trend.

I oppose the proposed increases in timber
harvests and road construction in the Gila National
Forest Draft plan. This plan is not economically
possible and obviously destructive to what few
wild lands we have remaining; don't destroy our
heritage.

I support wilderness designation for the
Lower San Francisco Canyon and Hells Hole.

Thank you

John T. Winter

Your not for profit community osteopathic hospital
3838 North Campbell Avenue P.O. Box 40338 Tucson Arizona 85717 0338 (602) 327 5431

114-1

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. As a result of comment received and a revision of timber benefit values, 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 30MMBF is projected for the first decade. Timber outputs no longer increase. Please refer to the Proposed Action Change Summary at the beginning of this document for additional details concerning the proposed timber program.

114-2

It is not completely accurate to single out individual costs, called timber costs, recreation costs, etc., and assume it provides only benefits to that function. Few single costs result 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 wildlife habitat diversity is maintained or increased. The timber harvest activities open up some stands. Additional wildlife forage becomes available in these areas. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this, even though some of the benefits are to 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.

114-3

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of the rationale concerning the recommendation.

Mark B. Trickay Jr. - Manager
 Spur Lake Cattle Co
 P.O. Box 277
 Springerville, Ariz. 85938

U.S. NATIONAL FOREST
 Silver Lake, Mexico

000115

OCT 07 1985

Oct. 3, 1985

DATE RECEIVED

Dear Sirs:

I am writing this in response to the Proposed Gila National Forest Plan. I am disappointed with the plan in general and your personal responsibility. This is a prime example of where "common sense" does not prevail. You have again ignored the ranchers "possessory interest" in his permit. I view the plan as one step by those who wish to push the rancher off of Federal lands.

I am going to attempt to be objective & to the point in my responses.

I feel that the "Proposed Action" puts too little emphasis on range & livestock management & too much emphasis on wildlife management. OF the alternatives being considered I feel that Alternative E comes most closely to addressing the needs of the cattlemen. Ranching is a business with economic needs that must be met. Reductions in livestock numbers could carry such an economic impact to put some cattlemen out of business. Thus generating less income for the Federal Government via grazing fees.

115-1

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 and if possible, 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 and existing funding levels, range improvements would deteriorate and, over time, a substantial reduction in livestock capacity would occur. 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 would still be higher than what currently exists. Secondly, the long term projected wildlife/livestock forage use is projected to be 29 percent utilization by wildlife and 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.

The exact capacity and permitted animal unit month level will be determined using standard allotment procedures and may vary from this level. We feel the Proposed Action Alternative results in a good balance of uses and will provide for a continued improvement the condition of the range resource on the Forest.

115-2

Alternative E was not selected as the proposed action alternative because it provided very little emphasis on resolving the timber or recreation issues. We agree from a livestock or wildlife standpoint, much of the conflicts would be avoided, but at a high cost and a lower overall return.

I am going to next address the Standard & Guidelines D02 on page 36 of the plan. This is a very dangerous paragraph. The Forest Service is continually telling the permittee that his investment into the permit [improvements, corrals, waters, fences, labor, maintenance etc] have little or no value. This is being said by reduction in grazing permits, wilderness areas, proposals for obscene grazing fees, pushes for riparian areas etc. There is a constant negative influence that stems from the Forest Service. Many ranches have put thousands of dollars into their permits to only have you as the Forest Service give no credit nor consideration to this investment. Concerning paragraph D02 part (1); the FS should not be able to give part of your permit away via the fact that F.S. money is involved. This is going to cause much contradiction, lawsuits & problems for all concerned. Concerning part (2); To encourage a permittee to try & take his neighbors permit over through money investments is disgusting. Can you see what you have written? Really?

My next comment concerns the maintenance of existing prairie dog towns. The prairie dog has had a history of destruction. A lot of time and money has been spent on the control & eradication of this pest. To encourage the existence & maintenance of prairie dog towns is in my opinion wrong.

115-3

The statement in the Forest-wide Standard and Guidelines D02 is intended to enhance permittee cooperation through rewarding the permittees for their efforts. In situations where permittee cooperation cannot be gained you are correct, the investments in improvements and livestock are in jeopardy as is the term permit. The Forest Service is a multiple use organization and we are concerned with the riparian and the wilderness values as well as livestock values. We retain the responsibility to regulate livestock management of the National Forest lands to enhance productivity and provide resource outputs that address all issues, not only those of the livestock producer. Permits to graze livestock on the National Forest are a privilege, not a right. If you are cooperating to maintain and enhance the range resource you should have no problem with the D02 statement as written. Investments in range improvements and cooperation could not cause problems or encourage permittees to take over other allotments as you suggest. If a permittee is unwilling to manage the range resource the privilege to graze will be lost.

115-4

Prairie dogs are apart of the total natural ecosystem and to maintain the existing numbers at their current low level would not cause serious land erosion problem. Should their populations expand and resource damage occur, adequate control measures would be taken.

Concerning riparian areas & protection fencing, I feel that everything should be done to try and avoid this situation. I am in particular referring to those riparian areas on the Spur Lake allotment, mainly, Loxie River, Jankins Creek, Badger Creek & Smith Creek. I have been involved with Fenced riparian areas on the Prescott Nat Forest in Arizona. There was a multitude of problems involved. Fences of poor quality, water gaps washed out, cattle becoming trapped within, cattle waters drying up, recreation impacts to name a few. Therefore I would encourage another solution ~~not~~ so as to avoid the use of protection fencing. Some examples could be rotation in the grazing plan, cattle diet etc.

As a progressive commercial cow-calf ranch we are in favor of a continuation of management level D. Times are changing very quickly in the livestock industry. From an economic standpoint, a level D management scheme must be utilized. Thus we are interested in maintaining a level D management.

115-5

We agree, fencing of riparian areas is a last resort effort to restore the area to satisfactory condition, but one that is available should the management activities you mention not solve the problem.

115-6

Management intensity is dependent on costs and the benefits received. In the case of Management Area 3D, management intensity level D has been selected. Each area stands on its own. The costs necessary to maintain a high intensity grazing system is greater than the cost of a one pasture yearlong system. In the case of Management Area 3D, it is most cost effective to continue management intensity at a high level because the benefits are also high.

Under Range D04, P117 of "The Plan", maintenance of past piñon-juniper push areas is needed. These old push sites could be maintained at a relatively low cost compared to initial push costs. Some of these areas are rapidly being grown back over with young trees. Also, any treatment of new brush areas is encouraged. I feel that piñon-juniper encroachment areas can be controlled by various means including; pushes, herbicides, fuel wood cuts, etc.

I would also like to encourage the development of sediment retention structures on the drainages within the Spur Lake Allotment. These structures will inhibit soil erosion while at the same time improve forage production.

Another comment that I would like to see put on record is that I feel that the wildlife numbers are misleading in that actuality there are more wildlife numbers than what is counted in the plan. This is important because your plan is using the wildlife numbers as a base. If the base or foundation is faulty, then the whole plan becomes faulty because it is derived from a faulty foundation.

115-7

We agree. The standards and guidelines listed in the draft Plan--page 117 under D04 activities--provide for continued maintenance of the Piñon/Juniper treated areas.

115-8

We agree. The Standards and Guidelines listed in the draft Plan--page 119 under F05 activities--provide for channel stabilization.

115-9

We disagree. The exact wildlife numbers as you are well aware, are difficult to attain. Wildlife are very mobile and no true method has been developed to support one estimate over another. Our best effort was made using New Mexico Game and Fish, Forest personnel, and permittees to estimate the existing populations. Validation of the 1980 estimates were conducted in 1985 with adjustments made. We feel the existing wildlife species estimates are reasonable and within the necessary accuracy level for the desired result.

Also, I want to recommend that the harvesting of timber be increased from an 80 or 90 down to a 60 retention level. This would do several things: (1) An area would be cut over more thoroughly --- opening it up & making it more productive to both livestock & wildlife. I also would like to see or recommend that when an area is harvested for timber, that encroaching trees on water sheds & drainages be cut & cleared. Also, while cats or heavy equipment is in an area that erosion &/or water developments be made. If this is truly a multiple use system the other components of the system should receive some benefits.

Water developments should be encouraged. In many areas of some pastures water is the limiting factor. Utilization by both livestock & wildlife is limited when water is lacking in an area even if forage is abundant. Therefore those areas that water can be developed in should be done so.

115-10

Timber cutting prescriptions have been set in the Forestwide Standards and Guidelines (page 38) which includes cutting timber to a growing stock level of a basal area of 50 to 70. Harvest methods are coordinated with other resources and some stands are managed to provide for old growth that benefits wildlife species requiring old growth habitat, just as other species benefit from an open timber stands.

115-11

We agree with your statement. Management activities are in place to develop water and or make improved use of existing waters where possible.

115-12

In summary, I can understand the concept of multiple use. What I cannot understand nor accept is the attitude of the Gila Forest Plan. I fear that of many in the Forest Service administration, which is the attitude that the rancher-cattlemen are the "bad" guys, the group to be shunned. You have made this a popularity contest between the cattle ranch environmentalists and the lobbyists. I ask you is that right? You should be showing some backbone & courage & looking out for the interests of the cattlemen as well. After all, the agricultural community is still the backbone of America. I would urge you to use common sense and show some courage to do what is right.

Sincerely,

Management of the National Forest is a dynamic process, constantly shifting in an effort to provide the resources required to respond to the issues and management concerns. It must be remembered that there is a tremendous demand placed on limited resources. This requires compromise on the part of all interests. The appearance that the Proposed Plan places the livestock permittee in a role, as you suggest, as the "bad" guys was not intended. The ranchers play a very important role in the overall management of the Gila. Other users of the National Forest also play a part and their concerns, just as your concerns, must be addressed. With a limited resource and an ever increasing demand, every interest group may feel somewhat less than fully accommodated. The Forest Plan has attempted to blend the diverse uses and needs of the Forest into one document where everyone has an opportunity to comment and hopefully to gain an understanding of the interrelationships that exist.

GILA NATIONAL FOREST
Silver City

OCT 5, 1985

OCT 1 85

000116

DEAR SIR,

I'M WRITING TO COMMENT ON THE DRAFT PLAN
AND GIS FOR THE GILA FOREST. I VISIT THE FOREST
SEVERAL TIMES A YEAR TO HIKE, CAMP AND ENJOY THE
SCENERY WITH MY FAMILY. IT'S A TREASURE, IN MY OPINION.

I'M CONCERNED THAT THE PLAN SEEMS TO
EXPAND LOGGING ACTIVITIES, ESPECIALLY ON
STEEP SLOPES. LOGGING MAY BRING IN CASH
TO THE FOREST SERVICE, BUT - FROM WHAT I UNDERSTAND -
ACTUALLY LOSES MONEY TO THE TAXPAYER, BECAUSE
THE SALES ARE SUBSIDIZED AND COST MORE
TO SUPERVISE THAN THE LUMBER EARNS.
MOREOVER, THE FOREST CERTAINLY DOESN'T NEED
MORE LOGGING ROADS!

I'M UNHAPPY, TOO, THAT TWO WILDERNESS
STUDY AREAS WERE NOT RECOMMENDED FOR
PERMANENT WILDERNESS, AND THAT ROADLESS
AREAS WILL NOT BE PROTECTED TEMPORARILY.

116-1

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 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 (approximately 15% below the original Proposed Action Alternative). Timber outputs no longer increase.

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.

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, a 57 percent reduction in projected five decade road construction. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information concerning the modified program.

116-2

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated totally from reviewing the dollars received from stumpage. Road construction is one of the major factors affecting the advertised stumpage rate. Road construction and reconstruction can be utilized for other purposes than providing access for sawlog harvest. If needed in the overall transportation plan, some of these roads may be retained to improve administrative efficiency or increase recreational opportunity. These are additional values that are derived from the sale program which are not considered in the appraisal process.

116-3

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale discussed in the Proposed Action Change Summary.

116-4

Of the approximately 689,000 undeveloped acres outside of the classified wildernesses, approximately 2,000 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. Again, please refer to the Proposed Action Change Summary located at the beginning of this document for additional information concerning the undeveloped areas on the Forest.

TOURISM EARNS FAR MORE MONEY TO THE
STATE THAN LOGGING OPERATIONS. I THINK IT'S
SHORTSIGHTED TO TRADE A LONG-TERM SOURCE
OF REVENUE (A BEAUTIFUL FOREST) FOR A SHORT-TERM
"BENEFIT" THAT LUSES MONEY TO THE PEOPLE WHO
USE THE FOREST. URGES YOU TO SELECT ALTERNATIVE F.
Sincerely Yours
JB ZIRKER.

116-5

We agree that tourism earns more money for the State than the logging industry; however, the tourist industry has a larger base than the national forest system. The national forests in New Mexico contribute to the State's tourist industry along with the many other attractions in the State. The Proposed Plan only addresses those resources and amenities present on the Cibola National Forest. Although there is doubt and uncertainties contribute to the State tourist industry, they are but a part of the tourist industry base. The revenue generated by the State tourist industry cannot be directly compared to the revenue generated by logging on the National Forest System.

116-6

Alternative F has the highest BIA, benefit, and F/D 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 type of concerns on the Forest (plant diversity, wildlife, 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.



000117

C R Hall
10-4-651 1/2 hr
2 1/2 hr
OFFICE
DATE RECEIVEDForest Supervisor
Gila National Forest
Silver City

To Find it Perfectly alright to log
the wilderness area as long as the
Scalers, loggers and others obey the
Wilderness Rules

"no motorized Vehicles Beyond this Point"
That means No Dozers, no trucks & no Roads
and that should apply to Forest Personnel
as well

Sincerely
[Signature]

117-1

The Gila Wilderness and all other designated wildernesses in the Forest are natural works of art and will be preserved in their natural condition. Wilderness areas are designated by the 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.

No timber harvest or can be proposed in wilderness areas. 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 in the Forest Plan. These standards and guidelines show that no timber harvest or other motorized activity will be permitted in wilderness.

000118

U.S. NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 07 '85

DATE RECEIVED

P.O. Box 991
Los Alamos, NM 87544
October 4, 1985

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, New Mexico

Dear Sir,

I have examined the draft for the management plan for the Gila National Forest. I have found several items that should be changed.

- I oppose any increase in timber sales and road building. In fact a substantial reduction is in order. The reasons are:
1. These timber sales have been losing money for at least five years. This country has a severe national deficit. There is a glut of timber on the market. The Gila Forest should not be aggravating these problems.
 2. These timber cuts are damaging to other multiple users. This is due to the steep and easily erodible terrain.
 - 3.

118-1

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 30 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. Average production from the Gila National Forest for the past 14 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 600 miles of roads. This is a 57 percent reduction over five decades. Approximately 85 percent of these roads would be closed after timber activities are completed.

118-2

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 may be 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, 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 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 timber investment. We will, however, continue to search for ways to reduce costs and increase benefits.

118-3

Due to public response, cable logging on steep slopes has been reanalyzed. This analysis has resulted in a reduction in the volume that would be logged on steep slope areas. The draft Plan would have provided for cable logging 8.5 million board feet annually in the first decade and the Plan now schedules the harvest of only 5.0 million board feet annually in the first decade.

Logging steep slope areas by means of cable systems will generally require less road construction and fewer acres logged. The acres scheduled for cable logging will produce more volume per acre because these areas currently have higher volumes per acre. Cable logging activities result in less soil disturbance than the conventional means of tractor logging. Although soil loss will occur, it is not of sufficient magnitude to reduce long term productivity.

This plan has recommended proposed wilderness areas for non-wilderness
uses. The Lower San Francisco Canyon and Hell & Hole should be designated
as wilderness] 4

Sincerely,

Paul Brannon
Paul Brannon

118-4

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 Change Summary at
the beginning of this document.

LETTER 119

FOREST SERVICE RESPONSE TO LETTER 119

5 October 1985

000119

Kenneth C Saeggin Forest Supervisor
Gila National Forest
2610 N Silver Street
Silver City, NM 88061

John P Heger
Box 241
Mesilla NM 88046

Dear Sirs

I strongly disagree with the proposed alternative for managing the Gila National Forest for the next 50 years. The increases in board feet to be harvested are unwarranted. There is already a glut on the lumber market, and projections of lumber needs based on data from the 1960s and 70s are not at all realistic at the present time. Timber harvesting has a highly detrimental effect on soil erosion in watersheds by decreasing canopy cover and thus increasing temperature, and by increasing siltation due to removal of soil-holding vegetation and disturbances by motorized vehicles. This is especially devastating when logging is done on high slope areas, as is suggested in the proposed plan. Timber harvest increases need for new road construction, which in turn increases the need for more roads, more fuel, more drive vehicles, more bee-hives, more vandalism, more trash. I also strongly oppose the increase in AUMs. Most of the riparian areas I have visited in the Gila have been shamelessly overgrazed. Witness the grazing enclosure in South Diamond Creek below Burnt Canyon. The contrast is amazing. Ranching is a dying industry; I feel the AUMs should be decreased. I am aware that grazing and logging produce dollars, and that fat dollars whisper sweet nothings in Washington politicians' ears. If the recreationist

119-1

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 average volume sold over a 10 to 15 year period 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 in the modified Proposed Action Alternative.

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.

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. Please refer to the Proposed Action Change Summary at the beginning of this document for additional information concerning the modified timber program.

119-2

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.

119-3

The Proposed Forest Plan did not recommend increasing grazing. The net effect of the Plan is to reduce permitted numbers by 33,000 AUM's over time.

were to pay a nominal fee, such as 50¢ per day, or more or less depending upon his/her activity (wilderness hiking, car camping, etc), the non-commodity users would also be floating dollars to decision-makers ears. And thus would have a voice. Has this ever been considered?

In summary, I strongly support alternative E, with its inclusion of the San Francisco and Gila River Wild and Scenic designations as well as the two wilderness areas. I cringe to think of what may happen to a beautiful and valuable natural area like the Gila if given over to the interests of loggers, ranchers, and businessmen.

Sincerely,
John Fittinger

118-4

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.

118-5

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 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.

118-6

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. The results of this evaluation are presented in the Proposed Action Change Summary located at the beginning of this document.

118-7

We have reevaluated our recommendation to the two wilderness study areas and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Change Summary for the rationale supporting this recommendation.

000120

September 30, 1965

Ant.

RE Gila National Forest Management Plan
and Environmental Impact Statement Lamar Reynolds

To begin I would like to introduce myself since although I own a small plot on the Gila National Forest near Luna and now reside elsewhere I have maintained an interest in the Luna Community and the Forest Service. I was raised in Luna and returned there for 4 years from 1948/1952 after graduation from college. Most years we have returned to the area to visit family and friends. My father had a homestead north of Luna on Trout Creek - had a small place in the State Land allotment now unknown allotment in the summer and wintered the cattle on the forest in another allotment in Buckeye Canyon near Antelope ranch in the winter. I will address only issues that I have a personal interest in or know something about.

I am not surprised that you received no replies on the plan at your first request from Residents. Although they have a vested interest most of them take the attitude of what difference does it make if I do or don't because for many years suggestions by permittees, forest users and even workers employed by the Forest went unheeded and whatever the ranger and supervisor decided was done.

I would like to express my congratulations to those who drafted these two documents. They contain considerable information, required hours and hours of research and planning.

thought, editing, preparation and typing. I am a lawyer at how complete as details they are. I am acquainted with other planning documents and report statements as find this one to be very complete.

I shall only comment on points when I disagree. There is no reason to do otherwise although much of the document I agree with. It has been needed for many many years and a closer relationship between forest users and the U.S. Forest Service is long overdue.

I reviewed only those portions that pertain to the Linn Area.

Carrying Capacity of Linn Area in Areas 3B, 3C, and 3D

Area 3B	3,324	To remove at the same stocking rate
3C	6,335	decrease of 10% below current level
3D	19,728	proposed increase of 15% in Area

also 3B managed at level C.

3C managed at level B

3D managed at current level

a little history on the area of 3B and 3C is in order. In early years 1940's before the Forest began ^{combining} grazing units to allow for rotational grazing of areas my father's permit grazed the State Line allotment, had a pasture that was ruled from the Forest near the ranch and ^{the} protected and carefully used the pasture for gathering cattle in the fall. We kept a milk cow and a horse on this then pasture but it ^{never} had any limited use and was carefully protected. This area you will find to still be in excellent condition because of the treatment it received in the years.

Another winter on the Forest in Bishop Canyon on at the land in Bishop Canyon which I now own 1/2 of. This area was also carefully protected and at that time the range was in ~~poor~~ good condition. The area lacked water development, so my father drilled this well on patented land to alleviate this problem. Also a tank was built for water.

When the permit was redesigned to allow for rotation and improve utilization of grasses, my brother now owned the permit and it was moved from the State Line allotment now redesignated allotment to the Centerville allotment. The Boulder Canyon allotment was added to the Centerville allotment but an error to compensate for summer grazing on the State Line was not added to my knowledge. Then placed more AUs on the Centerville allotment which was already being used to capacity. We are now observing the effects that more grazing. Area 3B is my own unit which Area 3C is his partner. When you ask the permittee how he is to the numbers of animals they could use that were authorized by the Forest through the Forest and the permittee is responsible for the number of animals or pasture conditions. The larger set them up and the permit holder the number he could graze. I suggested & developing one area for the livestock judgment of the Forest personnel a portion of the forest grazing area should be ~~placed~~ taken from one area and placed with other to manage the discrepancy. These areas should all be considered as one unit. My brother and I voluntarily spent many hours moving strays out of the State Line Allotment to protect the forage during summer.

I would agree that it is not quite as simple as explained and my brother purchased cattle allotment now included with Centerville that was later sold which complicates the picture.

Once again we are facing a similar situation - a permittee is moving moving out of the Centerville allotment and a large area has been suggested to go with him by Forest officials. Other permittees on the Centerville allotment have objected that this area is much more than the permit area for so many AUs and will leave the Centerville allotment short on time & carrying capacity. Again it is the judgment of Forest officials that makes the final ruling and the permit holder should not be held accountable for ~~Forest~~ ^{Forest} ~~Management~~ ^{Management} judgment. A more equitable rule would be to divide over a period of years to see if it is a good situation. I realize there are some problems but if feed grazing with forest is a privilege and not one owned by one man, then we should apply the same rules to all allotments. The allotment shows Areas 3B, 3C, and 3D to be managed as a different management area - but they are all similar land, plant species are about all be managed at the same time whether that means in the reports.

120-1

Management of the National Forest is a very complex undertaking. Thank you for your support and encouragement. We feel the planning process of integrating management objectives and public involvement will in time improve the management of the National Forest.

In your letter you present a situation where allotments have been combined; some in good condition with low stocking rates and others in lower condition. The situation of balancing stocking with the capability of the land as well as managing for the other resources is always a judgement decision, and one that can have adverse impacts to the operator and the land. In support of combining allotments into a larger unit and operating the small allotment as a pasture within the larger allotment; management flexibility is increased and costs are decreased. The improvement you suggest from the rotation of livestock would not have been possible without these combinations.

120-2

The capacity of a given area to support livestock varies with the management intensity applied and the other resource uses and activities that compete for the area. The current situation you present is one of collecting data and making the decision based on potential impacts. These decisions are not made in a vacuum but with your input and the input of others, we must all share the responsibility of making good decisions and then abiding by them.

120-3

Under past management practices range intensity level varied with the ability of the Forest Service and the permittee to contribute funds and the natural ability of the land to support grazing. Even though the land is similar in plant composition, the management intensity necessary to produce the quantity of good and services outlined in the Forest Plan will differ. The management emphasis in one management area may be different from that of another. The ability of each management site to support grazing at a minimal cost along with the use of the land for other conflicting activities provides the basis to determine the management intensity. In the case of Management Area 3B and 3C, the management emphasis favors wildlife while maintaining current livestock numbers. Once wildlife numbers reach a desired level, management decisions will focus on future allocations of forage and the management intensity level required to sustain these activities.

proposed increase in Wildlife Numbers

Wildlife Area No.	Current	Area
Area 3B 1319 with a proposed increase of 64%	51,975	
Area 3C 1752 with a proposed increase of 76%	57,565	
Area 3D 1775 No increase anticipated	165,000	

From my observation Area 3B and Area 3D are more suited for wildlife particularly elk than Area 3C which presently has no elk but they are there. I was told this summer a single elk was seen in Area 3B 225-heads elk was counted. This exceeds the entire 1390 CV AUM allocated for this area. Elk compete directly with cattle for grass particularly in the summer. The maximum stocking requirement for a 1000 lb elk is a very low, the same weight should be very similar. I do not feel the ranch should be penalized with a proposed amount but to allow additional wildlife to be grazed within area, it is fine. If the hunting numbers are to be increased it should be in Area 3D 165,000 acres and with the same carrying population as Area 3C 57,565 acres. Elk hunting is done in Area 3D and Turner Creek Area 3B for many years. C. groups have been out with the early 1950's and have been.

The permit holder cooperates with the Forest Service when his grazing system or rotations were initiated. As a result the range improved in condition. But now Forest and wildlife suggest they should not get any benefit from these range practices that were followed. They also suggest on page 108 that the

invested stocking rate in Area 3C depends upon whether emphasis will be placed on wildlife or on livestock. This statement places the priority for wildlife above that of the permit holder. This should be removed from the report.

The permit holder has protected the forest and wildlife both for many many years.

Personally I am not disturbed about the buildup of deer activity in the area. These species have a way of going up and down in cycles and have always been there. I am vitally concerned about the increase in the number of elk at the expense of the livestock industry.

120-4

Wildlife populations as proposed in the draft Plan have been reviewed with the New Mexico Game and Fish and the Permittees. There have been some corrections and shifts in management emphasis based on the input received. Management Area 3D was selected to emphasize livestock and additional livestock are proposed. The resource can support additional wildlife numbers only if they do not conflict with the livestock management emphasis.

120-5

A cooperative effort has been sought between the Forest Service and the Permittees, as well as other users of the National Forest, to work together to improve the resources for the benefit to all. This cooperation is encouraged and appreciated. The benefits from improved management of livestock result in the continued privilege of grazing on the National Forest. It will be the responsibility of all users to manage the resource to sustain productivity and to minimize impacts to other users.

120-6

The statement "...depends upon whether conflicts with wildlife can be avoided..." is the correct statement in this situation since the management emphasis is for improved wildlife habitat. Other areas were selected for an improved livestock emphasis.

120-7

Management of the National Forest for multiple uses, including wildlife, is required by law. The allocation of these uses and the future demands for National Forest resources make it necessary for the Forest to set a number for both livestock and wildlife that is consistent with the ability of the land to produce. When the numbers emphasized in the Plan are met, there will be a supplemental review to determine future allocation. The livestock and wildlife numbers will be monitored and adjustments made in the effort to effectively manage the resource.

What good does the elk hunter do the economy of Carbon County, these & the buying of the State National Forest? He purchases his license & mows them at point of origin and spend little except for fuel in the local area.

I strongly recommend that the Forest reconsider a proposed increase in the elk population in Area 3B and 3C. I feel the numbers should be reduced ~~substantially~~ through systematic hunting but not increased as proposed.

I strongly object to a build up with population at the expense of the livestock permit holders or units which are now marginal marginal & profit.

Land to be acquired by the Management Area

page 108 and again on page 113 you list lands proposed to be acquired by the Management Area. This information should be stricken from the report. As I read it it is in direct conflict to the National Environmental Policy Act and its objectives. I own some of these parcels of land and have no intention of giving them up. Some of these were homesteads our family and of our heritage. Other members of our family and I am sure others who own ~~these~~ other areas ~~that~~ lists feel the same as I do. The report will not be acceptable until this information is removed. So long as these lands are listed as lands to be acquired they are a threat to the owner since some other administration or well meaning individuals may think these are priority areas to be pursued.

Game dog colonies

On page 116 the report states the prairie dog towns will not be disturbed you know as well as I that these dogs contribute to land erosion since they completely remove all vegetation. If colonies have to be they should be located in areas along major highways where they can be viewed by the public as areas now are in Montana not out in the middle of an area rarely visited by those who might appreciate them.

Native timber & Road to Abilene

The Forest Service has been under direct attack by the press because they have constructed roads to areas to obtain timber where the cost of the road is greater than the amount the Forest Service receives for the timber. The timber does not pay for the road it should not be constructed.

120-8

The number of WAUMs is not all elk numbers, but rather the total wildlife use including cover and habitat for nongame species. Elk numbers are projected to increase an additional 35 head in Management Area 3B and 60 head in 3C. Much of this increase has already occurred since the start of the Plan. We feel we can maintain the livestock numbers and gain the numbers of elk proposed in the Plan.

120-9

Lands listed as desirable for acquisition in the draft Plan are lands that meet National Forest standards. They are lands that, on a opportunity basis, are desirable not mandatory for inclusion into the Forest System. For lands identified for acquisition, an agreement between the Forest Service and the land owner would be required. We do not see this as a threat because the final decision will belong to the land owner.

120-10

We disagree. Prairie dogs are a part of the total natural ecosystem and to maintain the existing numbers at the current low level, would not cause a serious land erosion problem.

120-11

Timber sale roads, as with most of the Forest activities, benefit more than just the timber sale contractor. It is difficult to place a full value on all the benefits of a road. It is not accurate to single out individual costs called road costs, recreation costs, etc., and assign single benefits to those costs. Few single cost results in a single benefit. As an example, costs that are called road costs are used to access timber sales. The road can be used for subsequent timber sales in the area. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this, even though some of the benefits are to wildlife, are called road costs. 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.

121-1

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation. The rationale for this recommendation can be found in the Proposed Action Change Summary located at the beginning of this document.

121-2

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. Please refer to the Proposed Action Changes Summary at the beginning of this document for more discussion concerning the undeveloped areas of the Forest.

121-3

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 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 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. Again, refer to the Summary of Changes section of this document.

The majority of the problem with flooding comes from the off-site movement of large volumes of water from areas in unsatisfactory condition. 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 degrade that supply.

OCT 07 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, NM 88061

000121

Re: The Gila
National Forest
Draft Plan and
Environmental
Impact Statement

Dear Sir,

I am concerned that the two Wilderness Study Areas were not recommended for wilderness recommendation.

Also, in the Plan, roadless areas were not considered for future wilderness in terms of interim protection;

② the emphasis is on logging expansion, with the road building that such expansion requires. We depend on groundwater in New Mexico to a very large extent. We need to keep our forests to aid in the accumulation of that groundwater, which must be replaced as we draw upon it.

(3) Too little
attention was given to non-game
wildlife protection, game manage-
ment details need elaboration -
Gameplay truly, . . .

121-4

We agree that non-game wildlife species are important but we feel non-game species were given the correct 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 habitat. Because of 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 within the indicator species selected. Specific management practices for nongame species (the exception is the species) are not developed because of the large number of 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.

LETTER 122

FOREST SERVICE RESPONSE TO LETTER 122

000122

917 Madison N.E.
Albuquerque, NM 87110
October 4, 1985

Wick W. W. W. W. W.
Silver City, New Mexico

OCT 07 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir:

I am writing to express my grave concern about the draft management plan for the Gila National Forest that was issued this past summer. In particular, I am distressed by the "preferred alternative's" call for a major increase in timber harvests and for a massive road-building program in areas that should be first considered for maintenance in a primitive state.

For the past five years I have spent about two weeks each year hiking in the Gila, so I have had considerable opportunity to observe the nature of the land there. One of the most outstanding features is its fragility. Even near water and within pine forests the vegetation level is extraordinarily low while the soil, comprised largely of sand and decomposed granite, is so loose as to be readily eroded by wind, rain, and the spring runoff. The problems of limited vegetation and loose soil are made worse by the dry climate found in the area so that, even in areas where the vegetation has not been disturbed, erosion is a problem. Cutting the timber that provides what little stability is available to the steep slopes in the Gila, coupled with addition of 1500 miles of roads (which I have observed to act as channels for initiating erosion), seems destined to change this fragile forest into a desert.

While previous trips have permitted me to explore the Middle and West Forks of the Gila River, this past August I had the opportunity to visit the San Francisco River basin. I was stunned at the low level of the river despite the fact that it was the rainy season and the previous winter had been quite wet. I suspect that removal of the timber that protects the watershed for this river will spell its destruction.

Finally, it was apparent from my visit to the San Francisco River why timber cutting in this area is not economical. The steep walls of the canyons in the area make access to the timber difficult and the amount of timber available does not appear adequate to even pay for the extensive road system necessary to recover it.

122-1

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 45MMBF 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 54MMBF. 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 the modified timber program.

122-2

Due to public response, cable logging on steep slopes has been re-analyzed. This analysis has resulted in a reduction in the volume that would be logged on steep slope areas. The draft Plan would have provided for logging 8.5 million board feet annually in the first decade, while the modified Proposed Action Alternative schedules the harvest of only 5.0 million board feet annually in the first decade.

Logging steep slope areas by means of cable logging generally will require less road building and fewer acres logged. The acres scheduled for cable logging will produce more volume per acre due to the fact that these areas currently have higher volumes per acre. Cable logging activities result in less soil disturbance than the conventional means of tractor logging. Although soil loss will occur, it is not of sufficient magnitude to reduce long term productivity.

122-3

We disagree. The National Forest Management Act requires that all timber stands be regenerated within five years of harvest. The implication that timber harvest eliminates water yield would only be true if the entire watershed were denuded and never revegetated. Even under these conditions, any rainfall would produce heavy flows and erosion during wet periods. The proposed Plan provides for increased watershed in satisfactory condition over time.

Since harvesting timber in the Gila National Forest is both uneconomical and destructive, I would like to register my opposition to this use and my support for other uses of this Forest

Specifically, I support the designation of Lower San Francisco Canyon and the Hell's Hole area just south of it as Wilderness Areas. In addition, because of the destructive nature of roads in this fragile environment, I support the management of the following areas in a roadless, undeveloped state as wildlife habitat and protected watershed that is limited to semi-primitive, non-motorized recreation and ecological study.

1 the 126,000 acres along the Mogollon rim from the Blue Range to the Gila Wilderness

2 freestanding Wilderness candidate areas such as the 40,000 acres of the Frisco Box and the 30,000 acres of the Eagle Peak area.

3 the 170,000 acres adjacent to the Aldo Leopold Wilderness

Again, I urge you to reconsider the preferred alternative in the draft management plan for the Gila National Forest in favor of a plan that is less threatening to this magnificent natural resource

Sincerely,

Cary J. Morrow
Cary J. Morrow

copies The Honorable Pete V. Domenici
The Honorable Jaff Bingaman
The Honorable Bill Richardson
The Honorable Manuel Lujan
Jim Norton, The Wilderness Society
Jim Owen, Coordinator, Sierra Club

122-4

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 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, 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. We 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.

122-5

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale presented in the Proposed Action Change Summary located at the beginning of this document.

122-6

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 for more discussion concerning the undeveloped areas of the Forest.



The Rio Grande Chapter of the Sierra Club

000123

954 Santo Nino Pl.
Santa Fe., NM 87501
October 5, 1985

Mr Kenneth C Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

GILA NATIONAL FOREST
SILVER CITY, NM 88061

OCT 07 '85

DATE RECEIVED

Dear Mr Scoggin,

This letter contains the comments of the Rio Grande Chapter of the Sierra Club on the PROPOSED GILA NATIONAL FOREST PLAN and DEIS. The Chapter represents the 3600+ members of the SIERRA CLUB in New Mexico and West Texas.

The Rio Grande Chapter strongly supports the comments of the El Paso Regional Group forwarded to you by Mr Jim Owen on September 30, and also the comments to be forwarded this date, or tomorrow, by the Santa Fe Regional Group. The comments of Mr Randal O'Toole, attached to the El Paso Regional Group comments, also reflect the views of the Rio Grande Chapter of the SIERRA CLUB.

We have been informed by our members that your planning coordinator, Mr Gerry Engel, has been personally responsive and helpful to all involved in preparation of our comments. Please accept our gratitude for his assistance.

We cannot, however, submit comments on this specific forest without expressing a sense of bitter disappointment that the successors to Aldo Leopold in the service of the U. S. F. S. in New Mexico would propose plans so opposed to his conservation ethic philosophy. Two glaring and basic premises of the GILA PLAN which so ignore the Leopold pleas for a land ethic pertain to (1) the economic basis for decisions and (2) prospects for wilderness. Typical Leopold quotes pertaining to these subjects (From the Sand County Almanac—with Essays on Conservation from Round River) follow:

• 'One basic weakness in a conservation system based wholly on economic motives is that most members of the land community have no economic value. Wildflowers and songbirds are examples.'

• 'Wilderness is a resource which can shrink but not grow.'

Economic Comments

As pointed out by the El Paso Regional Group Comments, we object to the EIS focus on various budgetary aspects rather than on the land base in arriving at choices and preferences among alternatives. We specifically propose and request that your next DRAFT Plan/DEIS contain major changes to: 1) the rather cavalier treatment of soil values in this region of explosive erosion; 2) the reputed comparison of priced timber and non-priced non-game wildlife benefits by the use of computer data; 3)

123-1

We do not see any need to develop another draft Plan and EIS. We feel we have recognized the concerns expressed on the draft Proposed Action Alternative, and were able to make changes to the Proposed Action Alternative to address many of these concerns. The development of another draft statement would require significant additional time and cost. This cost can better be used to implement the final Plan.

123-2

We disagree that soil values were treated in a cavalier manner. Productive soil is the base resource for all other resources. This is recognized in the Plan and all alternatives reduce soil loss over time.

123-3

A computer model was used to help evaluate data, but computer models did not make forest planning decisions. The non-game wildlife benefits you mention are a non-priced benefit and are considered in the development of objectives and constraints for the various alternatives. The objectives are not developed by a computer but are developed by the Forest Management Team, and consider priced and non-priced benefits as well as the needs and desires of the public.

LETTER 123

the obviously forced and unrealistic evaluation
of wildlife in terms of MRVD's (why not sunsets and wildflowers if
you are proposing such an approach?) 4

FOREST SERVICE RESPONSE TO LETTER 123

123-4

You infer in your comment that wildlife evaluated in terms of MRVDs is not a realistic approach. In addition to MRVDs, wildlife was evaluated based on species present, populations, and habitat requirements. MRVDs were not the sole evaluation criteria.

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 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 herbeaceous 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 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 El Paso 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.

LETTER 123

FOREST SERVICE RESPONSE TO LETTER 123

the reduction of the budget supporting the water program when in reality the major economic resource of the GILA Forest (and all New Mexico Forests) may be the WATER sales, and in particular the difficulty (for a laymen) to determine what portion of the road costs are directly a timber subsidy

The proposed Multiple Use Management Plan is not supported by a Multiple Use Budget. The Plan/EIS is full of broad generalities purporting to direct management action to solve specifics--all so vague ("protect" "improve" "careful management" "increased management intensity" etc) as to be impossible to evaluate. With recent well known reductions in USFS budget and personnel it is obvious to all--especially you USFS managers--that things are going to slip. Why not tell the public what will probably not be accomplished during the next ten years? The Monitoring portion of the plan, for example, appears to be absolutely fantasy since you and we know that the funds for an adequate monitoring program will not be available unless we all get together and impress Congress with the importance of an adequate budget.

The next DRAFT Plan should tell Congress, and the general public, what really will happen, under current budgetary constraints, to trail maintenance and picnic facilities, campgrounds and parking areas, law enforcement and clean-up; general maintenance and fire control, inventory of cultural resources and grazing monitoring, soil loss and water pollution, etc. We suspect that as the USFS budget suffers so will the Forest.

And we suspect that the intent of NFMA is that the Public be so informed!

Timber Economics are covered in some detail by the El Paso Regional Group Comments and by the comments of Mr O'Toole. We wish to emphasize two major issues.

At this time of an enormous Federal Deficit Below Cost Timber Sales make no sense at all. We recommend the complete elimination of all appropriated road construction funds for the next ten years.

123-5

We do not know where you got your information on the soil and water budget reduction. Soil and water were actually held at the current level on the original Proposed Action Alternative. In the modified Proposed Action Alternative, watershed improvement budgets have been increased 100 percent.

123-6

We are not sure what your exact concern is regarding timber sales and associated road costs. We feel that the detail in the Plan and EIS is sufficient. Individual timber sales in the 10 year timber sale program are shown in the Plan. The roads necessary to harvest these sale areas are also shown. Road cost were tied to prescriptions where roads were needed to get the combination of outputs. The tradeoff analysis section of the EIS explains what factors resulted in changes in PNW between alternatives. Without a more specific explanation, it is not possible for a more complete response.

123-7

The Multiple Use Sustained-Yield Act of 1960 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.

123-8

The Forest Plan and the Environmental Impact Statement are programmatic documents. We feel that the level of detail is appropriate.

12C-8

We do not think there is any way for us to project the effects of changing budgets over time. Not even Congress can tell us what our budgets will look like in the future. We realized when we developed the Plan that there is little likelihood of budget increases and that is why we included budget constraints in all of the Alternatives. These budget constraints are helping us respond to the lower budgets to which you refer. For example, in 1986, our plan budget level is only about seven percent below the actual budget allocation. This kind of budget difference is not considered highly significant.

The other thing that is important to remember is that the Forest Plan budgets are projected on an average annual basis. Budgets can be lower in some years and higher in other years and the Plan can still be implemented. We are still hopeful that the 10 year average budget will be close to the Plan level.

123-10

Please refer to our response to the El Paso Sierra Club letter for an answer to your concern on below cost timber sales.

123-11

We appreciate your comment. We feel, however, that some appropriated road construction will be needed to provide for multiple use of the Forest.

We regard the proposed timber harvest levels as unacceptable from the standpoint of economics } 12

In our view the U. S. Forest Service is not managing the GILA National Forest Lands as directed by the Multiple Use-Sustained Yield Act or the Forest and Rangeland Renewable Resources Planning Act. Wildlife and Recreation are being sacrificed in order to accommodate excessive timber harvesting and road building. And this in the face of the below-cost, economically unsuitable GILA timber program which during the past six years averaged a loss of \$0.19 for every dollar spent. } 13

123-12

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. Sixty-five percent of the roads constructed would be closed after timber activities are completed. (Please see our response to the CHEC letter for information on the economics of timber harvest).

123-13

We disagree that the Forest is not being managed as directed by the Multiple Use Sustained Yield Act or the Forest and Rangeland Renewable Resources Planning Act. In both the Proposed Action Alternative and the modified Proposed Action Alternative, recreation and wildlife are projected to increase. In the modified Proposed Action Alternative 97 percent of the existing unroaded area on the Forest would remain unroaded. Of the 3.3 million acres on the Forest, the original Proposed Action Alternative proposed to manage 432,000 acres for timber and associated outputs. In the Modified Proposed Action Alternative only 272,000 acres are managed for timber and associated outputs. This is only approximately eight percent of the Forest. Commodity outputs do not have to be eliminated to provide for the other multiple uses to which you refer. If that was necessary, this would truly not be multiple use management.

You also refer to the cost of timber activities. In previous comments, you used the word subsidy. As a matter of principle, we do not believe that it is appropriate to single out 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 by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who 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 actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Gila National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation users, dispersed recreation users, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered the timber industry is but one among many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

Grazing values and economics are also covered in detail by other comments. The credibility of the entire process of Planning-employing various alternatives to determine a preferred alternative-is diminished or destroyed by the arbitrary placement of a fixed number of acres for livestock grazing in each alternative! (Almost as transparent is the inclusion of only one alternative with consideration of Wilderness areas)

14

Wilderness As the quote on page one indicated, we are concerned that the choice of alternatives and programs pertaining to ORV's, timber, grazing, and road building, lead to an outrageous and irreversible "No More Gila Wilderness" Plan. At a minimum we insist upon

... Identification of roadless areas (by acre) which are proposed for development for timber or other uses.

Cancellation of all road building subsidies to timber companies, and use of road funds only for maintenance of existing roads (See above comments.)

Cessation of proposed steep slope sales both to preserve wilderness values and to save taxpayer dollars!

... Wilderness Designation for

The 125,855 acres along the Mogollon Rim between the Gila Wilderness and the Blue Ridge
The 40,050 acres of the Frisco Box.
The 30,380 acres of the Eagle Peak area.

15

Approximately 170,160 acres adjacent to the Aldo Wilderness which are merely an extension of that area.
The 18,860 acres of Hells Hole
The 6,700 acres of the Lower San Francisco Canyon

.. Revision, in the next DRAFT Plan, of the range of alternatives to include consideration of Wilderness Areas in more than one of the alternatives. All of the above areas must be considered for designation in the next Draft

123-14

Even though a fixed number of acres are shown as being available for livestock grazing, 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 must 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.

In response to the concern related to the range of alternatives, Alternative E has been modified to reflect a wilderness recommendation for the two wilderness study areas.

123-15

Even though 97 percent of the existing unroaded acres will remain unroaded in the first decade, the modified Proposed Action Alternative does result in development activities in some of the areas in which you are interested. Developments in these areas result primarily from timber harvest activity in areas where considerable timber planning has already been accomplished. Elimination of these sales would result in loss of past investments. A complete list of the effects of the modified Proposed Action Alternative on all unroaded areas is included in the Proposed Action Alternative Changes Summary located in front of the public response document. This summary also provides our rationale for not allocating the wilderness study areas to wilderness.

123-16

Cultural Resources The litigation against the U S Forest Service to Protect Cultural Resource Properties in the Santa Fe National Forest and Region 3 appears to have had little impact upon the Planning process of the USFS in Region 3.

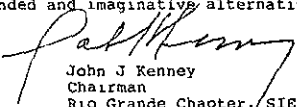
All alternatives "will result in some irreversible effects of cultural resources " "The protection of known cultural resources from pilfering and vandalism is the same for all alternatives " All alternatives include similar cultural survey and and clearance requirements And your Plan reports that 1805 of appx 65,000 sites have been recorded

The SIERRA CLUB is interested in plans and the realistic prospects for adequate budgeting for the survey of unknown sites, and in the protection of such sites Budgetary considerations will obviously limit such USFS work What will it take to record the others? How long under present budgetary constraints?

We believe that the public is entitled to a frank and open disclosure of the impact of budget cuts, low priorities of cultural preservation, and other priorities, on the protection of cultural resources We do not consider that the PLAN/DEIS contains such an open disclosure of consequences of alternatives, or alternative budgets We hope that the next DRAFT contains such a disclosure of information which is due to the public

Ideally it would be fitting and proper that the GILA forest-home of our first Wilderness-also be the first National Forest to admit that timber production is just not it's best use, and to rewrite the Forest Plan and DEIS with the view that forests in the NW and private forests in the South are better suited for timber production A new and long-lasting role of the Forest may then be determined without the blinders of unrealism which are imposed by RPA goals requiring below cost sales and road-building to support such sales

The Rio Grande Chapter of the Sierra Club is anxious to work with you as you continue the development of this highly important plan, hopefully with expanded and imaginative alternatives


John J. Kenney
Chairman
Rio Grande Chapter, SIERRA CLUB

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.

NEW MEXICO INTERSTATE STREAM COMMISSION

BATAAN MEMORIAL BUILDING
STATE CAPITOL
SANTA FE NEW MEXICO 87503



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ANN S RISHER, Farmington
M H SALMON, Silver City

October 4, 1985

000124

U.S. NATIONAL FOREST
Silver City, N.M.

OCT 07 '85

DATE RECEIVED

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

Dear Mr Scoggin

The following comments are submitted on the Draft Environmental Impact Statement (EIS) and the proposed Forest Plan for the Gila National Forest

A general comment is that the documents including the Summary are hard to read and difficult to understand because of organization, length and repetition. For example, four sections entitled Wild and Scenic Rivers appear in the report Chapter 2, pages 42 to 43, Chapter 3, pages 66 to 67, Chapter 4, pages 95 to 96, and in the Summary of the EIS, pages 20 to 21. These four sections are nearly identical including the two tables in each section. As a result, it is difficult for the reader to maintain concentration and, coupled with the unnecessary length of the text, detracts much from the usefulness of the documents. Many reviewers may simply "give up" before reaching important material, issues or concerns.

Appendix D of the EIS describes alternative forest management prescriptions for the Gila National Forest. Management for increased water yield is not identified as a proposed prescription. However, on page 113 of the EIS, overstory removal and snow fencing are mentioned as water treatments which may be implementable to increase water yield.

One of the original purposes of the establishment of the National Forest is "securing favorable conditions of water flows" (Organic Administration Act of June 4, 1897, 30 Stat 11, 16 U S C). The forest produces the major portion of the stream-flow in the Gila and Mimbres stream systems. The percentage of

federally owned land, excluding Indian reservations and other trust properties, in the western United States averages about 46% of the total land area. More than 60% of the average annual yield in the eleven western states is from federal reservations, and in the Rio Grande water resource region, which includes the Mimbres River, 77% of the average runoff originates on federal reservations (C Wheatley, Study of the Development, Management and Use of Water Resources on the Public Lands, 1969, 402-406, and Table 4).

124-1

We are sorry for the problems you had reading and understanding the document. We realize the document is complex but many of the organizational aspects of the document were mandated. You also mentioned the repetition. We included the repetition because we felt that some repetition was better than referring the reader to previous portions of the document. We continue to feel that referencing other sections would make the document even more confusing. We have tried to make the final documents less confusing.

124-2

The description of why a maximum water yield prescription was not considered for the alternatives is included on page 208 of the Draft Environmental Impact Statement. A minimize water yield prescription was included in the benchmark analysis and was found to be very costly for the small return. This prescription was analyzed in the first maximum present net value benchmark run and the prescription was never chosen. Since this was a very high cost prescription with only small water yield increases and since we did not have an issue on the Forest that specifically addressed vegetation manipulation and other activities to increase water yield, the prescription was not included in the final alternatives.

The information that you reference on page 113 seems to indicate that some of these practices will be used in some of the alternatives. It should not have been written to indicate this. We have rewritten this section in the Final Environmental Impact Statement. Snow fencing will not be used but silvicultural prescriptions may be used to enhance water yields where appropriate.

LETTER 124

The Gila River and its tributaries in New Mexico and Arizona, the Mimbres River and the Rio Grande in New Mexico are fully appropriated stream systems. During below average runoff years, chronic water shortages are experienced especially to diverters from the stream systems who do not have storage reserves. There are no appreciable water storage facilities on the Mimbres River nor the Gila River and its tributaries in New Mexico. According to the EIS, the Gila National Forest has a water yield of about 340,000 acre-feet per year. Even a small percentage increase in this total annual production would be most beneficial to downstream users in the several stream systems. At page 113 of the EIS, it is stated that overstory removal and snow fencing can produce an increase of water yield of 11,200 acre-feet annually by the fifth period. While that amount is only a three percent increase over the indicated water yield of the proposed plan, 337,000 acre-feet, it would be a valuable addition to the present streamflow and enhance the renewable natural resources produced by the forest. It is urged that the Forest Service implement these and other measures to increase water yield to the maximum extent practicable without inducing severe soil erosion.

The EIS does not contain sufficient detail on water yield estimates to enable a detailed review of management alternatives. This lack of detail is in contrast to the lengthy, repetitious descriptions of other management alternatives.

The "benefit value" of water yield increase is estimated at \$6.34 per acre-foot, page 218 of the EIS. According to the report, all benefits are based on the "willingness-to-pay price whether or not that price is actually collected by the Forest." This price for water appears extremely low. The marginal value of irrigation recognized much higher values, the marginal value in 1982 dollars for water in Region 2 is listed at \$45.00 per acre-foot. The Bureau of Reclamation (Minutes and Attachments, Task Committee on Augmentation of the Colorado River, Pacific Southwest Inter-Agency Committee, San Francisco, California, September 20, 1984). The Bureau of Reclamation estimates of the value of water in the Gila River area range from \$30.00 per acre-foot for irrigation to \$210.00 per acre-foot for municipal and industrial water (letter from D. F. Lawrence, Chairman

of the Pacific Southwest Inter-Agency Committee, to R. M. Peterson, Chief of the Forest Service, November 6, 1982). It is suggested that the "benefit value" for water yield increase used in the EIS be carefully reviewed.

The third paragraph on page 76 of the EIS and the second paragraph on page 26 of the Summary state that a majority of the water flowing from the Forest serves to recharge various groundwater basins including the Las Animas Creek and Lordsburg Valley groundwater basins. The area of these basins is not defined in the report. This statement in the report must be carefully reviewed. Data available to this office indicate that recharge from the Gila River to either the Lordsburg Valley or to the Las Animas Creek groundwater basins, as those basins are defined by this office, is de minimis if any recharge does in fact occur. Only the minor amounts of water that flow in the ephemeral stream channels on the southern slopes of the Big Burro Mountains would recharge the Lordsburg Valley groundwater basin.

The last sentence of the third paragraph on page 76 could be misleading. It is suggested that the words "in the forest" be added at the end of the sentence if that is what is intended. If it is intended to indicate the amount of groundwater withdrawn by all users for domestic and livestock-wildlife uses from these basins, the value of 153 acre-feet is too low.

124-3

The increase that you reference could only be obtained by implementing the maximize water yield benchmark. The implementation cost of this benchmark was approximately 10 million dollars annually. Even at this budget level, many of the other resource outputs and activities were held at a low level. In order to provide an appropriate level of management for other resources and outputs, the budget would have to be even higher. This type of budget level was not considered feasible. Most alternatives provide slight water yield increases over time, but to manage specifically for water yield increases equal or near the levels in the maximize water yield benchmark and still provide for a reasonable level of other multiple uses was not possible.

124-4

We disagree. Water yield was tracked and displayed for all of the alternatives. This shows the tradeoffs for all of the alternatives. Water yield for all of the benchmarks, including the maximum water yield benchmark, was displayed in Appendix B. A discussion of why the minimum water yield prescriptions were not practical was also included in Appendix B. The Environmental Consequences chapter discusses the effects of the alternatives on water yield. The discussion and data in the Draft and Final Environmental Impact Statements is sufficient.

124-5

We have reconsidered the benefit value used in the plan and feel that because of the high cost of producing additional water, a change in the benefit value would not have resulted in a significant change in the Alternatives.

124-6

Thank you for pointing out the error. We have deleted the reference to these 2 groundwater basins from the reports.

124-7

We agree. The change has been made in the Final Environmental Impact Statement.

The fourth paragraph on page 76 contains incorrect statements and should be corrected. It is suggested that the first sentence be expanded and rewritten as follows:

The United States Supreme Court, in Arizona v. California, et al, 1964, decreed to New Mexico about 16,500 acre-feet of consumptive use from the Gila and San Francisco River stream systems, exclusive of uses in the Virden Valley. In 1968, Congress authorized the Hooker Dam and Reservoir or suitable alternative as a unit of the Central Arizona Project and authorized the Secretary of the Interior to contract with water users in New Mexico in amounts that will permit consumptive use of water in New Mexico not to exceed an annual average in any period of ten consecutive years of 18,000 acre-feet including reservoir evaporation over and above the consumptive uses provided for by the 1964 decree United States Supreme Court. The Congress further authorized an additional consumptive use of not to exceed an annual average in any period of ten consecutive years of 30,000 acre-feet including reservoir evaporation if works capable of augmenting the water supply of the Colorado River have been completed and

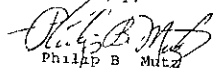
water sufficiently in excess of 2.8 million acre-feet per annum is available from the mainstream of the Colorado River for consumptive use in Arizona to provide for the additional 30,000 acre-feet of use in New Mexico (Public Law 90-537). The Bureau of Reclamation is conducting its Upper Gila Water Supply Study to determine the most feasible measure(s) to make available to New Mexico water users 18,000 acre-feet of consumptive use authorized by Public Law 90-537. The study schedule calls for release of the Draft Environmental Impact Statement in August 1986.

The second, third and fourth sentences of the fourth paragraph on page 76 are also not correct. In that portion of the Gila National Forest within the Gila and San Francisco River stream systems, the Forest Service, as well as other water users, can legally acquire valid existing water rights and transfer the use under those rights to other uses subject to the conditions imposed on the transfer. The same is true for significant water uses on those portions of the forest outside the drainage basin of the Gila and San Francisco River stream systems, except for the Zuni River system, in which a court order currently prohibits any transfers. The last sentence of the paragraph is not correct and should be deleted; the water developments could continue and new developments could be constructed whether or not consumptive use in the watershed is increased.

The fifth paragraph on page 76 could be misleading and should be rewritten. As noted above, the Rio Grande and the Mimbres River stream systems are fully appropriated and significant new water uses can be established only by the acquisition and transfer of consumptive use from valid existing water rights, and no transfer may be made in the Zuni River system. The State Engineer will permit appropriations for new uses only in the remainder of the Little Colorado River stream system.

The opportunity to review and comment on the Draft Environmental Impact Statement and the Proposed Gila National Forest Plan is much appreciated.

Sincerely,


Philip B. Mutz
Interstate Stream Engineer

PBM:lr

cc Sally Rodgers

LETTER 125

FOREST SERVICE RESPONSE TO LETTER 125

125-1

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.

In order to respond to the forest issues, the sawtimber volume of 30MMBF is projected for the first decade (this is approximately 15 percent below the original Proposed Action Alternative).

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. The volume from steep slope areas was reduced to 5 MMBF.

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, a 57 percent reduction in projected five decade road construction. Please refer to the Proposed Action Change Summary at the beginning of this document for additional details concerning the revised timber program.

125-2

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated totally from reviewing the dollars received from stumpage. Road construction is one of the major factors affecting the advertised stumpage rate. Road construction and reconstruction can be utilized for purposes other than providing access for sawlog harvest. If needed in the overall transportation plan, some of these roads may be retained to improve administrative efficiency. There are additional values that are derived from the sale program which are not considered in the appraisal process.

125-3

The price that permittees pay for the privilege of grazing is determined by Congress. Under existing law it is true that higher grazing fees would produce more funds for the development of needed improvement. The fees derived by the BLM are not considered in this Plan.

S WAYNE MOSTELLER
Box 1572
Silver City, N.M. 88062

000125

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 07 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, N.M. 88061

Dear Sir

I understand that a 50 year plan for the Gila National Forest is being drafted, and would like to express my opinions on the use of the forest

I think that increasing the timber harvest in the forest would be a gain to only a few, and a loss to many. The effects of logging the steep slopes, and building the necessary logging roads would be injurious to the land, by causing erosion, to wildlife, by removal of cover, to fish, by water pollution and silting of waterways, and to people, who would no longer be able to enjoy the primitive recreational opportunities. Sales of the Gila's timber over the last five years has lost over 2.5 million dollars according to the report I've read, I'd rather keep the trees AND the 2.5 million dollars.

I would also like to address the issue of grazing cattle on forest land. It is my understanding that cattlemen pay (1983 figures) \$1.40 per AUM for grazing rights, while the BLM appraisers determined the value to be \$6.65 per aum. It seems to me that the government (public) is being shortchanged by this system. It is also my understanding that in 1983 the BLM took in 24 million dollars in grazing fees, and spent 59 million dollars in range management programs. Again this seems like the public is getting cheated. I'm not sure that these multimillion dollar losses are continuing today, but I'd like someone to prove to me that they're not.

I live near the border of the Gila, and hike in the forest as often as possible. The ranch I live on has no cattle, and the grasses grow tall and beautiful with the

rain. When I enter cattle-infested lands, the ground is barren and eroded. I ask your support for keeping our Forest intact by protection of roadless areas, reduced timbering, and reduced grazing, or at least grazing at a fair price. I also would enlist your support for adding the lower San Francisco Canyon and Hells Hole to our wilderness area lands, and to manage Frisco Box, Eagle Peak, and land in the Mogollon Rim area as semi-primitive and non-motorized.

Thank you for your attention and consideration in these matters. I hope you share my concern for these areas, as once developed, they will never return to the places of peace and beauty they are now. What a shame that would be for our children.

Sincerely,

S. Wayne Mosteller

125-4

In the Proposed Action Alternative, livestock numbers are brought in line with capacity by both 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 conditions 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.

125-5

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation.

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. Please refer to the Proposed Action Change Summary at the beginning of this document for a discussion of the rationale supporting the recommendation for the two wilderness study areas as well as information regarding the undeveloped areas on the Forest.

126-1

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.

126-2

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale provided in the Proposed Action Change Summary located at the beginning of this document.

126-3

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 40MMBF 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 54MMBF. 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. About 65 percent of these roads would be closed after timber activities are completed. Please refer to the Proposed Action Change Summary for additional discussion concerning the revised timber program.

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. Again, refer to the Proposed Action Change Summary for additional information.

126-4

Without more specific details regarding this comment, it is not possible to respond.

000126

416 Bryn Mawr SE
Albuquerque, NM 87106
4 October 1985

GILA NATIONAL FOREST
Silver City, NM

OCT 07 '85

Forest Supervisor, Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Sir

DATE RECEIVED

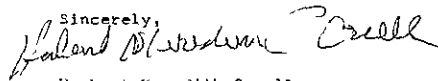
As is too often the case, those who should be the stewards of our national forests and our wilderness, throughout the nation, have succumbed to the logging interests who couldn't care less for the protection of our resources.

Following are concerns relating to the Gila National Forest Draft Plan and Environmental Impact Statement

1. Alternative F was not selected
2. The two Wilderness Study Areas for wilderness were turned down.
3. The expansion of logging will require road building and the harvesting of timber from steep slopes.
4. Certain managerial details are vague and require clarification.

Basically, I want no further desecration of our wilderness. The Sierra Club is dedicated to preservation, not exploitation.

Sincerely,



Herbert Meredith Orrell

LETTER 127

FOREST SERVICE RESPONSE TO LETTER 127

127-1

Thank you for your comment. For the comments that address your concerns, please refer to the responses to the comments in letter 002.

Oct 3, 1985
Placitas, N.M.

Dear Sir

000127

As a citizen of New Mexico and
a lover of its beautiful wilderness
areas I encourage and urge you
to support the EARTH FIRST! Ultimate
Treaty for The Gila National Forest

After looking at the Summary of
the Draft Environmental Statement for
The Gila, I was disturbed that the
Forest Service would like to log
previously un-cut areas now that
they have techniques to reach them
out of the way old growth stands
I am also opposed to any
additional road construction in the
Gila Forest.

Sincerely,
John M. Ashley

JOHN MYRICK ASHLEY
P O Box 698
Placitas New Mexico 87043

OCT 07 1985

DATE RECEIVED

FOREST SERVICE RESPONSE TO LETTER 128

LETTER 128

GILA NATIONAL Fb. NT
Silver City, N.M.

OCT 0, '85

DATE RECEIVED

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

S. E. King
Route 10 Box 306
Glenwood, N.M. 88039
October 3, 1985

000128

Re 1) Proposed Gila National Forest Plan
2) Draft Environmental Impact
Statement, Proposed Gila National
Forest Plan

Dear Mr. Scoggin,

I have reviewed the above referenced documents. I concentrated mainly on Management Area 4A since this area surrounds my home in Mogollon, N. M. I am concerned about the logging you say will take place here. I looked in the Forest Plan (Ref. 1, page 121). It does not say what specific parts of area 4A will be logged, but you are planning on logging one third of it.

Jerry Engel of your office says Mineral Creek basin is to be "cable logged". I visited the Mineral Creek basin last May. The riparian zone is shared by bear, other wild grazing animals and cattle. I looked in the DEIS (ref. 2, page 304) **. There is no mention of bear or cat and other species of the riparian zone. We know the riparian zones of the southwest are a most fragile environment, however you neglect to say specifically how the Mineral Creek riparian zone will be impacted by the proposed cable logging. How many bear use this habitat? Not to mention other wildlife, where will the bears go when logging begins? How will they impact the areas they move to?

In your DEIS (ref. 2, pages 77&124) you speak of riparian zones. You seem to agree these zones are fragile, the ecosystem "cannot be readily quantified" ***. These somewhat complex, unquantifiable zones, Mr. Scoggin, are the heart of our water and air purification and storage ecosystem. Any alteration in these zones will have irreversible effects. You have failed to identify obvious species of the riparian habitat which are as important as the coexisting stands of timber. You write them off as being not "readily quantifiable".

128-1

The Proposed Action Alternative has been modified. As you mentioned, the original Proposed Action Alternative would have resulted in managing 20,912 acres. The modified Proposed action will result in managing 4786 acres for timber. Only approximately 50% of this would be logged in the first 10 years.

128-2

The Plan and Environmental Impact Statement are programmatic documents and are designed to give management direction. They are not designed to provide ground level direction for all projects that will be conducted on the Forest for the next 10 years. Environmental effects of individual projects designed to implement the direction set in the plan will be analyzed during the project environmental analysis process. In the case of timber projects within the area, these projects will be designed to provide the planned timber outputs and provide for the increased wildlife habitat capability called for in the Plan. The specific impacts that you refer to and the mitigation measures to reduce these impacts will also be addressed at the project implementation level.

128-3

We agree that riparian habitats are important and we have clarified our management intent in the modified Proposed Action Alternative. (See the Proposed Action Alternative Summary of Changes at the beginning of the public comment document for the description of the changes that have been made.) We do not agree, however with your conclusion that we have written off riparian habitat species as not being "readily quantifiable". The quote that you use was taken out of context. In the Draft Environmental Impact statement it was included in a statement that read "The overall effect [of changes in diversity] on natural selection, gene flow, and other ecological processes cannot be readily quantified". This is a true statement. Riparian habitats are expected to improve over time in the Proposed Action Alternative.

We also do not agree that any alteration in these zones will have irreversible effects. If a riparian stand is lost and can never be restored, that would be irreversible. If a species becomes extinct, that would be irreversible. Riparian stands have historically been lost to floods, etc., but over time they have reestablished themselves. Many existing stands have been altered but over time the riparian condition can be improved. No species of wildlife will go extinct as a result of our management activity. Therefore, alterations in the existing riparian areas (most of which will improve conditions) is not irreversible.

You have not created an environmental impact statement, but rather an inventory and plan for reaping marketable forest products

I ask you, mankind asks you, please leave our fragile water sheds and air purifying forests to do their jobs.

- Keep the roadless, roadless
- Keep out the 2,3 and 4-wheelers
- Protect the riparian zones
- Close roads, don't build roads
- Keep out the loggers
- Keep the remote and isolated just that for all of us

The forest can manage itself. It seems to have done a fine job for thousands of years. What you need to manage, Mr. Scoggin, is the system that wants to exploit our forests and cause irreversible effects

Sincerely,

Stanley E. King

Stanley E King, P.E.

cc: Jim Norton, The Wilderness Society
Jim Owen, Coordinator, Sierra Club
Bill Richardson, Congressman
Jeff Bingaman, Senator
Pete Domenici, Senator
M Edward Nesselroad

* 20,912 acres/82,327 acres does not equal one third

** Ref. 1, page 121 and ref. 2, page 304 are redundant.

***Ref. 2, page 124, Irreversible and Irretrievable Resources, fourth sentence

128-4

Please see the Proposed Action Summary of Changes located at the beginning of the public comment document for a summary of the changes that have been made in effect on unroaded areas, riparian management, timber harvest levels and road construction.

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 produce resource damage. Historically, ORV use on the Forest has been light and has generally not resulted in significant resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use. To close areas when no problems are occurring would be no different than closing areas for other uses where no problems exist. The philosophy of the Forest has been and continues to be one of providing as much freedom of use of the Forest as possible. If problems develop or if management of specific areas conflicts with ORV use, then specific areas will be closed.

000129

(Encls 4)
Oct 4, 1985

Forest Supervisor
Gila National Forest
2610 W. Silver St
Silver City, NM 88061

Environmental Impact Statement/Forest Plan
This is concerning the cut down
on the allotment

I do not want to be cut down
on the allotment

That is what I am making a living
with.

If I will be cut down, that will
put me out of business.

I am in very poor health
and also my wife, and is costing
lots of money. If I'll be cut
down it will be very hard for
me to make my living.

I have made many improvements
on the allotment also, which are
all the water tanks.

Thank You
GILA NATIONAL
FOREST

OCT 07 '85

DATE RECEIVED

Very truly yours,
Gordon Klebe
The Game Warden

129-1

Thank you for your comment. The intent of the Forest Management Plan is to balance the permitted numbers with grazing capacity by the end of the second decade. Cuts will not be made unless they are necessary to meet this goal. The extent of any reductions will be determined through standard R-3 allotment analysis procedures. Due to the volume of data to be collected and the variability of climate these studies generally take two to three years to complete.

The Nature Conservancy

New Mexico Field Office
Post Office Box 1846 / Albuquerque New Mexico 87103
610 Gold S.W. Suite 202
(505) 242 2015

000130

October 3, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 No. Silver Street
Silver City, New Mexico 88061

Dear Mr. Scoggin

Thank you for providing us with a copy of the Proposed Forest Plan and DEIS for the Gila National Forest. We are pleased to have the opportunity to comment.

The Nature Conservancy is a non-profit conservation organization with over 200,000 members, of which 2500 reside in New Mexico. Our resources primarily are devoted to the protection of exemplary natural communities and habitats containing rare or sensitive plant and animal species. To identify these critical habitats we use data from many sources, particularly that compiled by the New Mexico Natural Heritage Inventory. This is a state program that employs standardized methods to generate information about New Mexico's natural elements. The Heritage Program was developed in 1976 through the combined efforts of The Nature Conservancy and the New Mexico state government.

The Gila National Forest contains a high degree of natural diversity and has one of the highest levels of endemic plant species in the State, including several recently discovered species. Likewise there are a number of important sensitive animal populations on the forest. We believe that scientific and educational uses should have management priority for certain lands on the Gila, and the following comments on the Plan are directed toward ensuring that such lands receive appropriate protection.

We do have a concern that the preferred alternative emphasizes logging of steep-slopes that have never been cut before, with 24% of the first decade timber volume coming from steep slope areas (page 5 of the Plan). This focus appears to be in direct conflict with the Plan's management direction to "improve all riparian areas to a natural condition". We believe that riparian areas are the most threatened habitats on the forest from the standpoint of sensitive and endangered species. Four Federally listed or candidate fish species occur on waters in or adjacent to the Gila National Forest. The catastrophic flood damage experienced on virtually every stream in the lower forest during the past three years should be a persuasive argument against steep slope logging. The Plan does not provide assurance that technology is available to insure that irreversible resource damage will not occur as a result of the cable logging proposed for all steep (over 40%) slopes that are scheduled to be cut. Therefore, we must recommend that the Plan be revised to significantly reduce timber harvesting projected for steep slope areas.

RARE AND SENSITIVE SPECIES

We appreciate that each management area description in the Plan includes a list of known threatened, endangered and sensitive species with either Federal or State status. It should be noted that the State has recently updated its lists for plants and animals with both additions and deletions to the lists that were used in preparing the draft Forest Plan. The final Plan should reflect these changes.

130-1

A concern regarding steep slope logging was expressed by several of the people that responded to the draft Plan. In the reevaluation of the Proposed Action Alternative it was determined that the most cost efficient method of obtaining the 30MMBF target (a 14 percent reduction from the harvest level in the original 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 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 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 at 59 percent of the project 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 should result in the construction of fewer miles of roads and less roading of presently unroaded area than obtaining 30MMBF 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.

We have made modifications to the Proposed Action Alternative as a result of your concern and the concerns of others. However, there are two specific statements in this portion of your comment with which we strongly disagree. The first statement is that "the catastrophic flood damage experienced in virtually every stream in the lower forest during the past three years should be a persuasive argument against steep slope logging. This infers that steep slope logging will contribute significantly to this situation". We do not believe that this is true.

Two of the three major rivers on the Forest have the majority of their headwaters in classified wilderness. Timber activities will not be conducted in these areas so increased runoff is not expected. Our data also indicates that the timber inventory on the Forest is increasing over time. This is because neither the original Proposed Action alternative or the modified Proposed Action Alternative would result in harvesting a volume equal to growth. Since over the total Forest, inventory increases over time, overall ground cover and evapotranspiration from the timbered portion of the Forest also increase over time. This is projected to result in a decrease in water yield over the first 50 years rather than an increase in water yield. Some additional water yield could be expected in localized areas but project planning in those areas will assure that that increase is not detrimental.

The second statement that we disagree with is that "the Plan does not provide assurance that technology is available to insure that irreversible resource damage will not occur as a result of the cable logging...". One of the first steps in the planning process was to define the tentatively suitable timber lands. One of the screens used in this process was that all areas where technology was not available to insure that irreversible resource damage would not occur were deleted from the timber base. This suitable timber analysis process resulted in a reduction of approximately 334,000 acres in the timber base on the Forest. (The 1962 inventory contained 766,007 acres of tentatively suitable timber and the JWP data indicated 432,361 acres.) In addition to the suitable timber analysis, standard timber contract specifications protect areas from irreversible resource damage.

130-2

We appreciate the information. The final Plan has been revised and now includes the latest information.

130-3

The suggested wording change has been added to the *Standard and Guidelines*.

130-4

In response to this comment, we have modified the Forestwide Standard and Guideline that deals with cooperating with New Mexico Natural Heritage Program on management of sensitive flora. We have added a statement that reads "On an opportunity basis or if funds become available, inventory plants on the New Mexico Endangered Plant Species List known to occur on the Forest".

Your suggestion to add a proposed schedule of priorities for developing recovery plans for T&E species is a good idea; however, it is *not possible* to do this at this point in time. The development of recovery plans often requires the coordination of several State and Federal agencies. Because of this, priorities often change from year to year. Since we cannot set the priorities for other agencies, the recovery plans priorities will have to continue to be developed through cooperative efforts with these other agencies.

130-5

The response to this concern is the same as that written for management area recommendation section.

130-6

The statement on page 19 has been deleted.

130-7

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 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 give some specific long term goals concerning riparian condition.

The management direction in the Plan for these species (p 33 and 34) is commendable. We have one suggested addition to the first sentence, p 34 "When management practices are proposed in or is likely to affect listed species habitat, a biological evaluation will be conducted."

In this section we also would like to see a commitment by the Forest Service to inventory all candidate species of plants on the New Mexico Endangered Plant Species list known to occur on the forest. The results of these inventories may well show that some of these species are not as rare as currently believed and therefore can be delisted. Somewhere in the Plan there should be a proposed schedule of priorities for developing recovery plans for T&E species.

PLANT AND ANIMAL DIVERSITY

The Nature Conservancy believes this to be a most critical issue for the Gila. Although the DEIS states that the PA would result in a moderate improvement in diversity, occurring principally in wilderness zones, Alternative F would result in the greatest improvement in natural plant diversity and the most stable levels of native animal diversity (DEIS p 109). Our recommendation will be to select Alternative F for those management units that contain the most fragile habitats or sensitive species (see Management Area Recommendations).

Page 19 of the proposed Plan includes the statement "The demand for diversity in native plants and animals is associated with wildlife and recreational activities. Demand is expected to increase proportionately to the two percent annual population growth." We suggest that the statement is unsound and that this paragraph be deleted.

RIPARIAN HABITATS

The Nature Conservancy recently undertook a survey of critical habitats throughout the United States and determined that riparian areas in the southwest are among the most threatened and in need of urgent protection of any habitat type in the country today.

Accordingly, our uppermost priority throughout the southwest is the protection of fragile riparian habitats and associated rare or threatened biotic species. Riparian areas are particularly important on the Gila, and we urge that the final Plan recognize this and provide for much greater protection and restoration than the "slight improvement" that would result from actions in the Draft PA.

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 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.

130-8

This is a mis-interpretation of the riparian effects table in the Plan and DEIS. The tables were designed to show the relative increase in riparian condition as a result of management activities. The proper interpretation is that the PA alternative would result in a 10 percent increase in riparian stand structure as a result of less livestock concentration in riparian zones and upper watersheds. This 10 percent increase is a result of reductions in livestock concentrations and improved management.

This table has been mis-interpreted by several people and has been modified in the final planning documents.

130-9

The Lincoln National Forest has different management problems than the Gila. We do not have the level of ORV use that warrants closure of the total Forest. Closure of all riparian areas to ORV use is also not warranted. In many of these areas ORV access is not possible, thus a closure would be an unnecessary restriction. ORV use of riparian areas is only one of many activities that could have detrimental effects. If we close riparian areas to ORV use when no unacceptable resource damage is occurring or is projected to occur, then it would be necessary to close them to all uses that may have a detrimental effect. The management philosophy on the Forest has been and continues to be one of imposing regulations only 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.

130-10

Our response to your concerns regarding management of these areas is included with our response to the specific areas that you mentioned under your Research Natural Areas and Special Interest Areas sections.

130-11

Forest-wide Standards and Guidelines have been modified as explained in the response to comment 7. We feel that these changes address the 11 goals you identify.

130-12

We agree that the 36 CFR 219.19 states that the reasons for each species selection be identified. We also feel that this has been accomplished in the Table 15 in the draft Environmental Impact Statement. This table contains a list of the species and the successional stage and vegetation type that the species indicated. The reason the species was selected was to indicate successional stages of each vegetation type on the Forest and serve as an indicator for detecting major habitat changes. A detailed explanation of the process used to define indicator species is included in the Analysis of the Management Situation available at the Forest Supervisor's Office.

The Plan calls for a 10% increase in livestock concentration in riparian zones and upper watersheds by the end of the fifth decade. That is likely result in further degradation to riparian habitats and we recommend that the grazing prescriptions in the Plan be revised to effect an early and increasing

8

decrease in livestock concentration in riparian zones

Of even greater concern is the ORV policy enunciated in the Plan whereby only four fairly small non-wilderness areas containing riparian values are designated for closure to ORV's. We urgently recommend that at a minimum all riparian areas be closed to ORV use. The Lincoln National Forest, New Mexico, has gone a step further with their plan, wherein the PA and all other alternatives except the no action alternative would close the entire forest to vehicle use except on system roads and trails designated as open or where authorized by permit or contract. We believe that policy would be appropriate for the Gila as well.

9

Several riparian areas have important sensitive or threatened species resources and will be addressed in our recommendations for RNA's or SIA's. These include the Tularosa Wetlands, the Gila River outside the Gila Wilderness, upper Mineral Creek, Willow Creek and the San Francisco Box. Additionally, habitat adjacent to waters containing the Gila trout, the Spikedace and the Loach minnow (the latter two fish recently have been proposed for Federal listing as threatened species) should have special protective measures spelled out in the Plan.

10

Finally, we recommend that the Plan address the 11 goals for riparian-dependent resources expressed in Chapter 5 of the Region 3 Riparian Area Handbook and that standards be included in the Plan for each significant riparian unit in the forest as called for by this handbook.

11

MANAGEMENT INDICATOR SPECIES

The list of 25 vertebrates selected for forest management indicator species appears to be sound, however, we ask that the reasons for each species' selection and a monitoring plan be identified per 36 CFR 219.19

12

LETTER 130

130-13

The list cites the Sonoran Desert Sucker as an MIS. Actually, there are two separate species, the Sonoran Sucker (*Catostomus insignis*) and the Desert Sucker (*C. clarkii*). We recommend that both be included in your list since they are representative of different riparian habitats.

No plants are on the list, although 36 CFR 219.19 indicates that T&E plant species are appropriately included. We recommend that Goodding's onion (*Allium gooddingii*) and Gila groundsel (*Senecio quaerens*) be added. Both are state listed species and are indicative of the health of riparian areas and canyon bottoms in some critical upper zones of the forest. Another state endangered species to consider for the MIS list is the Himbres figwort (*Scrophularia macrantha*) known from several canyon and steep slope areas on the forest.

RESEARCH NATURAL AREAS (RNA)

We commend you for proposing that four new RNA's be established under all planning alternatives. The Agua Fria Mesa RNA, representative of montane grassland, was a fine addition to the list earlier recommended by the Region 3 RNA Committee. This area has good species diversity and includes a mosaic of old growth communities. We suggest that the final Plan include a set of standards and guidelines that would apply to the management of established RNA's. (The proposed Lincoln National Forest Plan may serve as a good model for RNA standards and guidelines).

The proposed Turkey Creek RNA constitutes an excellent design for representation of a mixed broadleaf forest type in a riparian habitat, as noted in the proposal report. In addition, you should be aware that just above the RNA above a natural barrier on Turkey Creek is one of the major populations in New Mexico of Roundtail chub (*Gila robusta*), a State endangered fish species. In smaller numbers, the chub also occurs in the RNA, but the exotic small-mouth bass, which preys on the chub, coexists here. To further protect the chub, we suggest that a fish barrier be constructed on Turkey Creek at the lower end of the RNA, and that the bass be removed between the two barriers. It should be noted in the Plan that this RNA extends into management unit 7F as well as 8A.

We encourage you to include a statement in the final Plan that the Forest Service will continue to search for additional candidates for RNA status as called for in the Region 3 Research Natural Areas Progress Report. The Nature Conservancy believes that USFS legal mandates and regulations suggest a broader definition of areas suitable for RNA designation to include areas representing unique or special habitat that may be sensitive to threats from human activity. To this end we propose that consideration be given for establishing additional RNA's in the following areas:

Upper Mineral Creek This area features a high level of plant diversity, a rich mosaic of communities and important riparian values. Of special concern to The Nature Conservancy are the two most threatened plants on the forest which are to be found here, *Allium gooddingii* and *Senecio quaerens*. In addition, two other plants on the New Mexico Sensitive Plant List, *Eriogon scopulinus* and *Silene wrightii* are known to occur in the upper drainage of Mineral Creek.

Willow Creek Tributary This area, not far from the existing campground, has many of the characteristics cited above for Mineral Creek. Both areas contained outstanding terrace or intermittent riparian stands of blue spruce but erosion from the floods over the past three years has impacted this resource. It is likely that Upper Mineral Creek will prove to be the more appropriate place for a blue spruce/riparian RNA. In that case, we would recommend Botanical Area designation for some portion of the Willow Creek drainage system.

Lower San Francisco Canyon This probably is the most extensive reasonably unaltered tract of lowland riparian habitat remaining on Forest Service lands in New Mexico and Arizona. It features a rich flora of riparian shrub and woodland biotic communities and a corridor where several southern vertebrate species reach their northern limits and others are in the southern limits of their ranges within a transition between Sonoran and Madrean communities. For scientific and educational purposes, it deserves special protection status despite its not having the pristine qualities normally associated with RNA's, due to the effects of grazing and ORV use. The endangered black hawk and Bell's vireo both nest in the San Francisco Box. The endangered narrowhead garter snake (*Thamnophis rufinotatus*) is found here as endangered minnow (*Tiaroga cobitis*), a fish candidate for Federal T&E listing. But the real value is a combination of plant and animal diversity that is unique in this State.

The Nature Conservancy would be glad to discuss with you ways in which we might assist the Forest Service implementing inventory, preserve design and designation for these or other sites that may be considered for RNA status.

The two suckers to which you refer are included as indicator species. In Table 15 of the DEIS the suckers were called Sonoran/Desert Sucker. Both of these suckers are indicators of low successional stages, and are therefore included together. They were both included because of the distribution of the different species.

130-14

The planning regulations [36CFR 219.19] state that in the selection of management indicator species, the following categories should be represented where appropriate (emphasis added): threatened and endangered 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 changes 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, Gila 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 provided 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 that includes many of the plants listed as threatened in the State.

130-15

We agree. The proposed research natural areas have been made a management area. Standards and guidelines will be included for the areas.

130-16

The recovery plan for the roundtail chub is presently in draft form. If the recovery plan calls for a barrier, we will evaluate the need.

130-17

Research natural areas have been combined to form their own management area and removed from both of these management areas.

130-18

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 to recommend additional RNAs in the Plan that have not been studied as part of the Regional RNA reports. We do recognize, however, the importance of input on this topic from organizations like yours. To insure that this input is not

lost, we have added a new standard and guideline to the each one of the management areas containing areas that you have recommended for classification as RNAs. An example of the way these standards and guidelines are written follows:

SPECIAL INTEREST AREAS (SIA)

Although the draft Plan lacks this important category, we hope that zoological or botanical Special Interest Areas can be added to the Plan to accommodate areas that possess unusual scientific values but do not represent the pristine conditions or other qualifications appropriate for RMA status. We request that the following areas be considered for stronger protection than presently afforded in the Plan through SIA designation.

Tularosa Wetlands (Management Area 6A) This 200 acre area is proposed for ORV closure in the Plan, but heavy grazing continues to degrade this magnificent example of a wetland in public ownership, a relatively rare phenomenon in New Mexico. In the past, the wetland has been a breeding ground for the Mexican duck (previously Federally listed) as well as ruddy duck, cinnamon teal, Virginia and sora rails, among others. The New Mexico endangered montane vole (*Microtus montanus*) has been recorded in the recent past. Bald eagles now winter in the immediate area which also harbors perhaps the most vigorous population of nesting Lewis woodpeckers in southwestern New Mexico. Four native fish species remain in the creek here. We can predict that rehabilitation of the wetland would result in a significant increase in plant diversity, which already is substantial. This area has great appeal as a dramatic riparian recovery preserve, with high public visibility from the nearby highway and campground. A simple fencing plan may be the key. A zoological SIA is recommended.

Gila River Riparian Preserve (Management Area 7F) The importance of affording protection to the Lower Gila River within New Mexico already has been recognized through the Memorandum of Understanding for Interagency Cooperation in 1973 and the subsequent designation by the Forest Service of the Gila River Bird Area and Gila River RMA. With this Plan, another opportunity exists to designate protection status to the lower Gila in the vicinity of the mouth of Mogollon Creek. This site contains what may prove to be the best Arizona sycamore stands in New Mexico along with one of the richest avifauna in the state.

In recent years, The Nature Conservancy has purchased 196 acres of private land on Mogollon Creek and the main stem of the Gila River for scientific and educational purposes. These lands neighbor the Gila National Forest. As the nearby communities expand with new summer homes and residences along the floodplain, additional public land protection is essential. We would like to consult with you as to how this might be achieved.

The Nature Conservancy supports the ultimate protection of the Gila River Bird Area and associated RMA by the U S F S. The Forest Plan should address potential threats to these areas and other Lower Gila River resources from the several alternatives for water projects that would impact forest management on these critical riparian zones. Both Spikedace and Loach minnow, candidates for Federal T&E listing, are in these waters.

Gila Springs and New Mexico Hot Springs Snail Habitat (Management Area 8A) These two State endangered species (*Fonticella*, species undescribed) occur only in two unnamed springs near the junction of the Gila River and its east fork. Although both springs are within the Gila Wilderness, greater protection measures are needed, particularly for the warmer of the two springs which is known to be used by bathers. Zoological designation is recommended.

Hess's Fleabane Type Locality (Management Area 4D) This Federal candidate and State endangered plant, *Erigeron hessi*, is known only from a single location between Center Baldy and Whitewater Baldy, about 1 mile south of Whitewater Baldy. Although there are no known current threats to this species which grows in crevices on rock outcrops in the spruce-fir forest around 10,000 feet elevation, it is so rare as to merit Botanical Area designation for its habitat. A probable new species of death camas (*Zygadenus* sp.) is found in the same general vicinity. A species management plan for *Erigeron hessi* needs to be developed.

Main Diamond Creek (Management Area 2E) Zoological Area designation is recommended for these waters containing probably the most important remaining population of the Federally Endangered Gila trout (*Salmo gilae*). Main Diamond Creek also exhibits important riparian values.

Inventory the upper Mineral Creek area to determine if part of the area should be considered for RMA designation. If any areas appear to qualify, make a recommendation to the Regional RMA study committee so that the areas can be evaluated in relation to other areas in the Region.

130-19

We do not feel that the areas you have recommended need a special designation at this time. The following discussion of each area documents our rationale for this conclusion.

Tularosa Wetlands - The Tularosa wetlands area is presently fenced to protect the riparian vegetation. Livestock grazing is controlled so that the area is utilized only during the non-growing season. A stream flows through this area and the water gap fencing does get washed out during floods. When this happens some additional livestock grazing has occurred. The fences are repaired as soon as possible after floods so the management system can be restored. We have also had some trespass grazing problems in the area. We will continue to try to control this problem.

In addition to the special range management considerations, there is also a plan to restore a lower stream gradient within this area to control downward cutting of the stream and protect the wetland. Two additional standards and guidelines have been added to the Plan to better direct management of 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.

With the addition of these standards, we feel the area is adequately protected.

Gila River Riparian area - Since this area is adjacent to land owned by the Nature Conservancy, we will continue to work with you on cooperative management of the resources in this area. Since the management needs for this area have not been totally established, we feel that a recommendation for a special interest designation would be premature. If this designation is necessary to manage the area it could be recommended at some time in the future.

Gila Spring and New Mexico Hot Springs Snail Habitat, Hess's Fleabane Type Locality, and Main Diamond Creek - Since all of these areas are presently within classified wilderness, no additional special designation is necessary to protect these areas.

LETTER 130

MANAGEMENT AREA RECOMMENDATIONS

On some management areas containing a number of sensitive or T&E species, the proposed Plan places appropriately high emphasis on managing the unit for these values. On some others, we believe the management prescriptions should be shifted toward a greater emphasis on maintaining or improving plant and animal diversity, and improving riparian conditions as stated in the DEIS summary.

Alternate F results in the greatest improvement in plant diversity, provides the most stable levels of native animal diversity and results in the greatest improvement to riparian resources according to the DEIS. Therefore, we recommend that the Alternative F approach be taken for Management Areas 4A, 4B, 4C, 5C, 5D, 6B (west and south of the Continental Divide), 6C and 7F. In the PA, all these units appear to lack sufficient protection emphasis or appear to be out of balance in the direction of high commodity output production that threatens negative impacts on fragile biological resources.

It should be noted that our recommendations for RNA's, SIA's or other protection measures throughout this plan are not intended to "lock out" the public. Indeed, we believe that protected areas have high educational value and that public use and enjoyment of these lands should be encouraged so long as the natural resources therein are not degraded.

MONITORING

U. S. Forest Service mandates place great importance on establishing baseline data followed by monitoring and evaluation of the various prescriptions called for in each forest Plan. Our concerns here include the preparation of inventories for sensitive and T&E plants, monitoring of Management Indicator Species, monitoring of all plant and animal sensitive and T&E species, and the development of recovery plans. The PA properly identifies all of these objectives.

The Plan calls for five years of baseline data of inventories prior to commencement of monitoring MIS, T&E and sensitive species. We recommend that the final plan designate priorities for this task concentrating on areas that will be impacted by logging activities, and that target years for accomplishing the inventories be identified.

Likewise, we recommend that priorities and a timetable be added to the Plan for the numerous recovery plans that will be required. The budget for all of the above is estimated in the PA at \$10,000 per year. We suggest that this is grossly inadequate and recommend that the Plan identify a \$50,000 per year budget item that would permit hiring a full time ecologist for the forest or contracting out the studies needed to accomplish the task.

The Nature Conservancy is convinced that it is the interest of the Forest Service and the public to provide the protection measures we have suggested above, and we look forward to working in cooperation with the Gila National Forest to achieve the various strategies for public land protection. Again, thank you for the opportunity to comment. Please retain us on your mailing list.

Sincerely,



William W. Dunmire
NM Public Lands Coordinator

WWD/mh

cc Regional Forester
USFS, Region 3
Attn: RNA Committee

130-20

Your concern relating to riparian management has been addressed with concern number 7 and your concern regarding diversity has been answered with concern number 21.

130-21

We agree that alternative F results in the greatest diversity and that the maintenance of diversity should be an important consideration in the Plan. It is important to note, however, that the diversity level attained in Alternative F was attained by manipulating vegetation in all of the Logical Timber Management Areas on the Forest. We feel that the modified Proposed Action Alternative may actually come closer to meeting your goal of a "protection emphasis" in some of the areas about which you are concerned. More large blocks of forest would remain unaltered under the modified Proposed Action Alternative.

In the modified Proposed Action Alternative approximately 272,000 of the 432,000 acres of tentatively suitable timber on the Forest are projected to be entered over the first five decades. This would result in 48 of the 108 Logical Timber Management Areas on the Forest not being entered or a significant portion of them not being entered. Only approximately 13,800 acres that are presently unroaded would be logged in the first decade. This should result in a good distribution of nongame species population centers and relatively undisturbed vegetation areas.

In addition to the Logical Timber Management Areas where entries are not projected in 50 years, 70 percent of the suitable timber areas would not be entered in the first decade.

Livestock grazing activities will continue in most of these areas, so some influences of man will continue to occur.

130-22

We agree in principle with your recommendation. We feel, however, that the target years for accomplishing inventories is satisfied by saying that they would be done in the first five years. We will modify the frequency statement in the modified monitoring plan by adding a sentence that states "The priority for gathering baseline data will be put on areas where habitat changes are likely as a result of planned management activities."

130-23

The response to this comment is the same as the last part of comment 3.

130-24

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.

000131

October 4, 1985

GILA NATIONAL FOREST
Silver City, N.M. Mexico

OCT 07 '85

DATE RECEIVED

Kenneth C. Scoggin
Forest Supervisor
2610 N. Silver Street
Silver City, N.M. 88061

Dear Mr. Scoggin:

The following are my comments on the Proposed Gila National Forest Plan. I do not understand it well enough to do much commenting on it. Even after the meeting in Luna, N.M. October 1, 1985 there are a lot of wordings and phrases that I still do not know how to interpret.

The three or four things that I would like to comment on are as follows;

1. The WAUM's in Unit 6 (Reserve Ranger District)

- a. Area 6A is estimated to have 838 WAUM's and it is dictated in the plan to decrease by 8% to 771 WAUM's or 1 WAUM to each 141 acres by the 5th decade
- b. Area 6C which borders Area 6A is estimated to have 5037 WAUM's and it is dictated in the plan to increase by 58% to 7958 WAUM's or 1 WAUM to every 17 acres by the 5th decade. These 7958 WAUM's are one of the highest, if not the highest numbers on any area in the Gila National Forest.

If this is not a misprint and these numbers are by design then it is completely out of context. I do not see any way possible to keep 10% of the WAUM's in Area 6A and 90% of the WAUM's in Area 6C when they join each other. There is no way one could control Area 6A to the point it would only contain 64 wild animals. If the figures in Area 6A and 6C were to be incorporated into the proposed plan Area 6A would never be in conflict with wildlife and area 6C could do nothing even at the Permittee's expense that wouldn't be in conflict with the wildlife. I think the figures in Unit 6 should be changed to coincide with the average on the other Units on the Gila National Forest.

2. The levels B,C,D for livestock ranches on the Gila National Forest.

- a. I think that by the Forest Service putting a level B,C, or D on a permittee's ranch that they are also

putting a price tag on the ranch. Example; a "B" ranch you couldn't sell at any price, a "C" ranch would be hard to sell, a "D" ranch would be the only ranch a buyer would want or be looking for. I don't think the Forest Service should be in the business of pricing ranches.

- b. I don't think that the levels B, C and D should be incorporated into the plan. I think it would hurt the ranching business even more than it is already. I think that when all of the ranchers finally realize what it means to have to be tagged a "B", "C" or "D" ranch that it is going to cause frustration and hard feelings between the ranchers themselves and between the ranchers and the Forest Service

- c. I think that if you are going to segregate ranches then you should segregate grazing fees. Example; "B" ranch \$1.00, "C" ranch \$2.00, and "D" ranch would pay \$3.00 an AUM grazing fees. I don't think either should be done

131-1

We agree. The WAUM's as shown in the draft Plan are incorrect in several management areas. Based on your input we have rerechecked our data, and have coordinated with all parties, including the New Mexico Game and Fish, the local District Rangers, and the Permittees. Adjustments have been made to the Plan WAUM's as suggested.

131-2

Management of the National Forest for all the goods and services demanded with a constrained budget requires an analysis of each management area and the ability of that area to produce, and at what cost. The draft Plan assumed the federal budget for range administration and improvements would increase to a level necessary to maintain the majority of existing improvements. The amount contributed by the permittee would remain about the same. Based on this assumption, the level of management intensity was selected that would provide the best mix of goods and services and the least cost. Because we do not know the economic situation of each ranch operation, along with the possibility that a higher level of management intensity could be attained with additional funding, the Plan has been changed to read, "Grazing Allotments will generally be managed to level _____ or above". This will allow the potential for the management intensity to increase and provide the permittee incentive that may have not been apparent in the draft Plan.

131-3

Management Intensity levels provide a guideline to future management decisions. They remain in the Plan only as a guide.

131-4

Grazing Fees are beyond the jurisdiction of individual Forests to adjust.

3 Which Alternative to incorporate into the Plan.

a. I think Alternative E is probably the best for the ranchers if one of the Alternatives in the plan has to be incorporated into the plan. I don't think any of the alternatives should be put into the plan. I think that if any of the proposed alternatives are put into the plan that by the 5th decade one or maybe even two ranchers in most of the areas could be totally eliminated from ranching on the Gila National Forest

b. I think that all capacities should remain intact as their management plans state. I think that the plan should dictate that everyone work together to achieve that goal. Thus keep all of the permittee's on the Gila National Forest. This would be a difference of approximately 3000 AUM's as proposed in the plan.

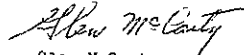
4 Forest Service Financial problems to sustain ranches.

a. The reconstruction of boundry and interior fences would require the largest amount of money to sustain the ranches. Proposed Solution Example: That the Forest Service add one cow unit to each permittees permit for every 4 miles of boundry or interior fence that the permittee is responsible for. This would be the Forest Service total contribution for fencing. The management plan should dictate that the permittee re-build his proportionate share of new fence every year for 40 years. This would relieve the Forest Service of any financial expenses for fencing. This would be just 84 AUM's average on Unit 6 per permittee

b. Pinon and Juniper Control: Money saved from fencing could be used to compensate for extra AUM's by using it on a similiar Forest Service - Permittee cost sharing plan

These are my comments and ideas for the proposed management plan for the Gila National Forest. If all permits are to remain intact for the next 40 years on the Gila National Forest there is going to have to be some kind of a working relationship arrived at between the permittees and the Forest Service. I sincerely hope that this can be done

Sincerely,



Glen McCarty
Permittee

131-5

Livestock grazing is one of the multiple uses provided by law. The economic situation (under current management) of continuing to develop new improvements and to maintain all the existing improvements for a higher level of livestock output on all lands is in question. Some lands lend themselves to other resources types of uses at a lower cost, thus allowing the Forest Service to respond to other demands put on the Forest. We feel the projected outputs for livestock are within the ability of the land to produce, in addition to providing for other multiple uses. The Proposed Action Alternative provides for sustaining the livestock industry, not eliminating it.

131-6

We agree. The capacity of a given allotment will remain as stated in the allotment management plan as long as the resource remains productive and the objectives of the Forest Plan are being maintained. To accomplish this we will all need to work together and be willing to accept and negotiate demands by the various interest groups. The Forest Plan will not adjust the capacity or permitted numbers. Adjustments, if necessary, will be based on data collected in the allotment analysis.

131-7

The solution you presented to the financial problems faced by the Forest Service is very interesting; however, it is beyond the scope of the Forest Plan. Your concern regarding the cost of maintaining existing improvements will need to be resolved if we are to continue to permit livestock grazing on the National Forest.

131-8

Livestock management on the National Forest is dependent upon our ability to change and adjust our funding as well as the relationship with other uses. Savings from all resource activities will need to be programmed into cost sharing programs as you suggest.

131-9

We appreciate your willingness to cooperate and your suggestions. They have made a difference in the final Plan. There will need to be a working relationship between the permittees and the Forest Service. The Forest Plan provides the frame work to accomplish this goal.



000132

American Fisheries Society
Arizona-New Mexico Chapter

Rt.1, Box 4A
Dexter, New Mexico 88230

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

Dear Mr. Scoggins:

As you may be aware, the Arizona-New Mexico Chapter of the American Fisheries Society is a professional organization comprising an interagency representation of federal, state, and university scientists, resource specialists and students concerned with long-term fisheries values, management and conservation. As such, we are very much aware of the importance of the National Forests to the sport fishing industry and of their unique value to terrestrial and avian vertebrates and non-game aquatic species. Some of these are State and/or Federally listed threatened or endangered species. What happens on National Forest lands affects not only the streams immediately adjacent to the activity but can also impact aquatic resources for a considerable distance downstream, sometimes clear off of the Forest.

The Gila National Forest provides a wide diversity of fishing opportunities for the public. These range from high mountain trout streams to productive put-and-take trout reservoirs and warmwater catfish and bass stream fisheries.

Your Plan acknowledges this by noting that more than 71,000 RVD's of fishing occur on the Forest annually. In addition to the recreational, consumptive use of the fisheries, several endemic nongame aquatic species also depend on the waters of the Gila National Forest for their existence. The value of the riparian zone, both terrestrial and aquatic, is reflected in the fact that two of the eight public issues relate to maintenance and improvement of fish and wildlife resources and riparian habitat.

We have reviewed the Draft Environmental Impact Statement and Proposed Gila National Forest Plan from the standpoint of the fisheries and associated aquatic and riparian resources. The following comments are provided for your consideration.

We commend your efforts towards conservation and recovery of the Gila trout. The Gila National Forest has had an aggressive habitat management program for the Gila trout for many years and the Plan will continue that effort.

In general, we feel that the Plan should provide more meaningful direction for aquatic and riparian area management in order for the Forest to meet the

expected public demand for fisheries related activities and to fulfill the requirements of the National Forest Management Act. We feel that aggressive habitat management to enhance fish populations and fishing opportunities will be increasingly more important to the public. In particular, the proximity of the Forest to fast growing population centers such as Las Cruces, El Paso and Tucson, Arizona will continue the rapid increase in recreational use on the Forest. Although the proposed alternative (PA) proposes to provide modest improvement in developed recreation and wildlife related recreation by Period 5, the PA falls short of your projected future use and potential supply estimates in Table 1. In light of the likely shortage for these categories of public use, we feel the Gila Forest Plan should give much greater consideration to Alternative F and question the heavy emphasis on increased timber production in the PA.

October 3, 1985

IF5	H	IR	EYE	EAR
NO		KNOX	WFE	LOS
LS		YOR	OPR	POWR
YH		FMA	ANDRO	WENC
YH		WS	TE	FA
LS		SCH	SE	CHAMP
WHL		OSP	CS	WHL
LAP		LA	WCS	CH RO
LAP		ARC		CH RO

OCT 04 1985

PLANET

132-1

Thank you for your comment.

132-2

We agree that riparian habitats are extremely important. 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 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 [please see the Proposed Action Alternative Summary of Change located in front of the public comment document] 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.

132-3

We agree that the wildlife related recreation demand will not be met by the end of the fifth period. It is important to consider, however, that most demands on the Forest will not be met by that point in time. The resource base and the expected management levels limit the supply potential for most resources.

We agree that Alternative F would provide a high level of wildlife related recreation but it does not address several of the other issues on the Forest. We feel that 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 net public benefits than Alternative F.

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. Southwest harvest projected in the Draft was at approximately 35 MMCF per year in the first decade. This amount was projected to increase over time to 45MMCF in the fifth decade. The revised plan projects timber harvest at 30 MMCF per year during the first decade. This amount is projected to remain at approximately the 30 MMCF level over time. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMCF. The existing allowable sale quantity is 54MMCF.

LETTER 132

FOREST SERVICE RESPONSE TO LETTER 132

Another basic concern is the likely impact on watershed condition and soil loss rates that the major increase in timber harvest on steep slopes will have in future years. The Gila Forest Plan indicates that 10 of 28 administrative watersheds (930,800 acres) are currently in unsatisfactory condition. The series of damaging floods in the Gila and San Francisco River drainages were probably, at least partially, a result of watershed conditions. The Plan does not clearly identify whether special management consideration will be given to reducing or eliminating timber harvest and grazing pressure in watersheds in unsatisfactory condition. Lack of special consideration for the impact of these resource uses on watersheds in unsatisfactory condition could contribute directly to flood damage in future years. We would like to see a section in the Gila EIS discuss potential and current consequences of watershed conditions in flood damage both within and downstream from the Forest

During the past decade, the American Fisheries Society and the Forest Service have coordinated closely in the management and rehabilitation of riparian areas. We are enclosing a copy of a speech given by Forest Service Chief Max Peterson to the American Fisheries Society in which he outlined the Forest Service's policy on riparian area management. We encourage the Gila National Forest to share your Chief's goals of maintaining healthy and productive riparian areas.

With the riparian ecosystem comprising only 0.8% of the Forest's land base, two-thirds of that in moderately low to low condition, and nearly one-third of the wildlife on the Forest dependent on or using that ecosystem, one would assume that riparian area management and protection would be an important item in a Plan that "Provides for moderate to high degree of issue resolution." Instead, we find that the Preferred Alternative "results in a slight improvement in existing riparian condition and moderate improvement in habitat diversity." In fact none of the Alternatives, including Alternative F, will result in significantly improved riparian conditions over the 50-year planning period. We specifically mentioned Alternative F, the amenities alternative, as failing to improve riparian habitats because in a low investment grazing alternative, grazing in the riparian zone will increase due to lack of controls such as fencing for proper livestock distribution.

The Standard and Guideline given for riparian habitat management directs only to "Strive to meet the Regional Guide." Your Regional Guide directs that 25% of all riparian areas must be in satisfactory condition by year 2000, and all must be in satisfactory condition by year 2030. We recommend that the Standard and Guideline for riparian habitat management on the Gila National

Forest be to meet, rather than "strive to meet", the Regional Guide in the timeframes given.

132-4

As a result of public comments, the projected steep slope volume has also been reduced. The proposed harvest level in the original Proposed Action Alternative was 8.5 MMBF. The modified Proposed Action Alternative projects a first decade steep slope volume of 5 MMBF. Steep slope logging with cable systems results in less ground disturbance than tractor logging on 0 to 40 percent slopes. As a result, we do not feel that this activity on the limited acres effected will have a major impact on watershed condition.

In your comment you state that "the series of damaging floods in the Gila and San Francisco River drainages were probably, at least partially, a result of watershed condition. We agree that poor watershed probably

condition contributed to the flood effects but we have no way of quantifying the magnitude. We are sure, however, that watershed condition by itself could not have prevented the floods. This is confirmed by the fact that serious flooding occurred in upper watersheds that are within the wilderness and not grazed or used for timber harvest.

Even though the effects of watershed condition on flooding were not discussed in the DEIS, we feel that effects of the alternatives on watershed condition were adequately considered. We feel that improving watershed condition is very important. All alternatives improve condition over time.

132-5

We do share the Chief's goals of maintaining healthy and productive riparian areas. We have set riparian condition goals in the modified Proposed Action Alternative and will take every opportunity within other multiple use considerations to improve riparian conditions.

132-6

We agree. The regional guide standards and guidelines have been added to the Forest plan.

The condition of riparian habitat is affected primarily by the land uses in the watershed, primarily grazing, roads, ORV use, and timber harvest and management. Controlling those activities can usually result in dramatic improvements in riparian conditions. The Environmental Impact Statement states that of the watershed acres in unsatisfactory condition, 35% could be controlled through grazing management, ORV control and road management. Although Standards and Guidelines for the Management Areas provide good direction for direct riparian and fisheries habitat improvement, it is necessary to control conflicting uses in the watershed before direct improvement will be meaningful. This is especially important in light of the statement "Conflicting uses in riparian areas are expected to intensify."

We recommend that the Gila National Forest provide more positive direction for controlling conflicting uses in the riparian ecosystem in an effort to improve the deteriorated riparian conditions on the Forest in a timely manner. Some methods that have worked in other areas include protective fencing of riparian pastures, outloping and waterbarring of roads, road closures, and prohibition of wheeled or tracked vehicles in stream buffer zones during logging activities.

Throughout the western United States, the most degrading land use practices impacting fisheries resources has been livestock grazing. On grazed rangelands the riparian zone is consistently overgrazed with a resulting loss of habitat for both fish and wildlife. It is unconscionable that the Plan does not acknowledge the degraded riparian and fisheries conditions on the Forest and that the Gila National Forest refuses to balance range use with capacity until the fifth decade. We strongly urge you to review your range management responsibilities and manage the resource in a professional manner.

In the Southwest, the demand for fishing is increasing five to ten percent annually yet the Preferred Alternative provides only for a slight increase in trout habitat capacity and little change in warmwater game fish capabilities. We feel that you should emphasize fish habitat maintenance and improvement along with controlling conflicting uses in order to meet the increasing public demands for angling.

132-7

The plan does include provisions for protection fencing. It is included with the wildlife standards and guidelines in most management areas. This is an expensive and high maintenance activity and will be used only if other measures to improve low condition riparian area are not successful.

Outloping and waterbarring of roads are standard procedures. As a result, we did not feel that it needed to be included as a standard and guideline.

Road closures were not adequately addressed in the Draft Environmental Impact Statement. Approximately 65 percent of all of the new roads that will be constructed will be closed after management activities are complete. Many of the existing travelways on the Forest will be closed. This will result in a decrease in open road density on the Forest over time. This information is displayed and discussed in the final planning documents.

Timber management adjacent to streams is designed to improve wildlife habitat and maintain the aquatic environment. Stream shading is maintained. Watershed improvement is a primary goal. Vegetative manipulation is often used to improve stream flow and to increase forage groundcover. These activities often require the use of wheeled or tracked vehicles near the stream. The effects of these activities are of short duration. Specific restrictions adjacent to stream areas are handled through timber contract specifications. These are developed during the project planning stage of Forest plan implementation. The development of these specifications require site specific information that is not available at the Forest Plan level. As a result, stream-side objectives are better met through the use of contract specifications developed during project planning than standards and guidelines developed at the Forest Plan level.

132-8

In your comment you state that in the Plan does not balance range use with capacity until the fifth decade. This is not true. The Plan provides for balancing permitted numbers with capacity by the end of the second decade. We feel that the increased capacity and the reduced permitted numbers proposed in the Plan is the best method of continuing to increase range condition. This will also provide for improvements in riparian habitat. Even though capacity and permitted numbers will not balance until the second decade, significant progress will be made in the first decade.

132-9

The increasing demand for fishing opportunity is recognized and improvements in the carrying capacity of aquatic/fisheries habitats will be emphasized wherever possible. In response to public comment, a Management Guideline [standards and guidelines], which emphasizes improvement of Riparian areas has been added to the Modified Proposed Action Alternative. [See response to your comment #2]. This guideline aid resolution of conflicts with livestock grazing, roads etc.

The capabilities for increasing fisheries production are limited by both natural resource capability and associated budget constraints. Every effort to improve fisheries habitat capability will be taken within these constraints. It must be recognized, however, that fishing opportunity is naturally limited in this area. Even under Alternative F, which includes stronger emphasis on fisheries improvement, supply will not meet the projected demands for this recreational activity.

LETTER 132

FOREST SERVICE RESPONSE TO LETTER 132


Several of the popular fishing lakes on the Gila are eutrophic due to livestock grazing, timber harvest and roads in their watersheds. Much of the degradation resulting from these uses can be alleviated through proper design and control. We suggest that Management Direction be provided to reduce the eutrophic conditions of the lakes. A 1983 report by the New Mexico Environmental Improvement Division outlined techniques for restoration and management of Lakes Roberts and Quemado that could be incorporated into management of the Forest. The amount of additional fishing that these lakes

could sustain could easily justify the expenditures necessary to restore them to maximum productivity for fisheries. We would also recommend the formation of an interagency committee (including the New Mexico Department of Game and Fish) to evaluate the future need for construction of small fishing lakes in the southern half of the Forest to help alleviate the obvious future shortage in water-based (developed) recreation.

The monitoring plan for riparian habitats is inadequate. It does not explain what biotic condition index is, nor does it describe what the objectives of the monitoring are. There is no objective for what the monitoring will provide in terms of directing Forest management. We suggest that the Forest determine (through baseline studies) what the current situation in the riparian habitat zones is, and then set goals for each of the planning periods. Some suggested parameters for monitoring fish habitat include volume of fine sediment in spawning gravels, water temperature, stream shade, streambank stability, and large woody debris. We feel that aquatic habitat studies should be closely coordinated with population studies of the resident trout indicator species in order to determine the quantitative impact of existing and future management actions within both riparian zones and their associated watersheds. The Forest should also set a goal to limit the number of miles of road per square mile in the riparian area and then monitor that trend in order to reduce the impact of roads on the riparian zone.

We would be pleased to work with you in developing more meaningful Standards and Guidelines for riparian zones and fish habitat on the Gila National Forest. We are sure that you agree that fish, wildlife and recreation are, and will continue to be some of the most important uses of National Forests in the Southwest. We urge you to meet the challenge in managing the Gila National Forest for the best interest of the resource and future generations of all resource users.

Sincerely,


Buddy L. Jensen
President, AZ-NM Chapter

132-10

Snow Lake, Quemado Lake and Lake Roberts are, as you mention, all eutrophic to one degree or another. The reason for this is primarily because these lakes are shallow (less than 60 feet in depth) with very weak thermoclines and they exhibit high evaporation rates. Additionally these lakes are only filled to overflow levels during intermittent periods, so a consistent inflow and outflow is not present. As a result natural accumulations of nutrients are concentrated and magnified in these lake systems. Road locations, grazing, and timber activities may to some extent add slightly to this. However these activities are not the primary factors involved in Eutrophic conditions at existing lakes. The majority of nutrient accumulation simply comes from natural watershed input.

132-11

Development of additional lakes on the Forest does not seem practical at this time and is not proposed under the Proposed Action Alternative. The following summarizes considerations that are involved.

1. Water rights are generally unavailable, especially in large quantities, and high costs involved in purchasing water rights are prohibitive.
2. Interagency reviews of potential dam sites indicate fairly low site potentials and marginal lake design capabilities. Marginal shallow lake sites would be eutrophic with high maintenance and management costs plus fisheries production potentials would be limited.
3. Natural siltation levels at potential sites would result in lakes with short life spans (30-80 years) and expensive siltation management problems.

132-12

We agree the aquatic habitat portion of the monitoring plan should be clarified. This has been revised in the Modified Preferred Action Alternative to include Aquatic/Fisheries Habitat Evaluations every five years.

The Aquatic/Fisheries Habitat Evaluations will include assessment of sediment, spawning gravels, stream bottom type, water temperature, stream shade, stream bank stability, large woody debris, macroinvertebrates, and other habitat components important to fish and other aquatic species.

Where possible these Aquatic Habitat Evaluations will be conducted in conjunction with fish population studies conducted by the New Mexico Department of Game and Fish.

132-13

A standard and guideline has been added to the final plan that states that "where possible, road construction will be avoided in riparian areas". This standard and guideline expresses the goal to minimize road construction in these areas. Since indicator species are being monitored and riparian condition are being monitored, we do not feel that a special monitoring item needs to be established for road miles.

LETTER 133

FOREST SERVICE RESPONSE TO LETTER 133

Gila, New Mexico
1 October 1985

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

GILA NATIONAL FOREST
Silver City, New Mexico

Oct 14 '85

000133

DATE RECEIVED

Dear Mr. Scoggin

As a native of the Cliff-Gila Valley and having derived my living from farming and ranching in this area all of my life, as well as my Grandparents before me and now my Grandchildren are doing so now, I have a very deep concern over the Gila National Forest Draft Environmental Impact Statement and Proposed National Forest Plan.

My philosophy is that we are stewards of this land and if we don't properly care for the land we will eventually lose the productivity of this land. I also believe in the multiple use concept.

I have seen many different Rangers over this district and many Supervisors and each of them brought their ideas and concepts which many were put into use and some weren't. We were able to work it out. In this report I cannot see where there is any consideration for agriculture. The only priority that I can see is wildlife. The ranchers have been responsible for controlling the predators. Once in a while we have received help in this but not often. As the predators are controlled to protect livestock, the game animals are protected at the same time. The only salt they get are from the ranchers. In times of drought the wildlife eat the supplemental feed as well as the livestock. In the 1930's, when my grandfather, Peter M. Shelley moved his livestock out of McInnes Park and the higher parts of the Gila National Forest most of the deer followed the cattle. There are not near as many deer in the Gila Wilderness today as there were then. I know through experience that deer and cattle are compatible.

The cattle numbers through the years have already been reduced on the Gila National Forest to the point that would further cuts would force ranchers to look closely as to would any further reduction in the permit would let him continue to operate. This will affect the economy of Grant County which is already stressed. I surely cannot see the reasoning behind the 60% cut in the Red Stone-Rough Canyon area. I cannot see any better use for much of this country than cattle.

133-1

Your concern for the productivity of the land is shared by many and will remain the driving force behind all land management decisions.

133-2

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 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 still a higher emphasis on livestock than currently exists. Secondly, the long term projected wildlife/livestock forage use is projected to be a 23 percent utilization by wildlife and a 77 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.

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.

133-3

Livestock grazing on the National Forest is a important activity that is authorized under the multiple use law. The level of management and future numbers will depend upon funding, cooperation, and conflicts with other uses and activities of the National Forest. Our analysis indicates that maintaining a high level of livestock management emphasis on all areas of the Forest is economically prohibitive. Our cost to reconstruct all existing facilities is in excess of our ability to pay.

Ranching like other agricultural activities requires an evaluation of past and future sustained levels. We are aware of the economic impacts that adjustments in livestock numbers might create; however, we have the responsibility to manage the land to provide for more than just livestock grazing. The numbers in the Plan are only projections, they will be set based on an updated analysis and in cooperation with the permittees.

LETTER 133

The condition of the range is debatable. At different times I have had United States Forest personnel, after riding on our permit, tell me that our permit was in as good of a condition as any in that district. It will never be able to be compared to a country where there is more rainfall.

I am proud of the Spar Canyon Permit and the way it has been maintained through the years. I have been pleased with our association with the Gila National Forest, but this plan is ridiculous. I think you need to start over with more input from the people who know the land.

Sincerely,

Ethel Ruth Hooker

4
5

FOREST SERVICE RESPONSE TO LETTER 133

133-4

Range condition has a joint meaning: (1) the land's current health and productivity and (2) the ecological composition. It is true the condition of the range is debatable and varies with the type of management applied.

Range condition, soil stability, riparian condition, browse condition, economics, and other resource emphasis on the land all come into play in determining capacity.

133-5

Forest Planning like any other planning requires a good working knowledge of the resources and an understanding of the related issues. To establish the knowledge level for range, the existing range allotment analysis was used. To identify the issues, several public meetings were held and issues developed. With this data the draft Plan was developed, and the public was again asked for input. You have responded with your comments as did hundreds of others. The input received has been good, and is responsible for several changes in the Forest Plan.

Gila Nat Forest

Dear Sir,

000134

The U S National Forest Service management plan for the Gila Nat Forest is not a good or realistic plan for our fragile region. We need the trees to help maintain a clean atmosphere, give birds and animals shelter, maintain our erosion balance, and water retention. More roads in the area would also defeat this timber land here, we need timber — but not from a land that has so little room and takes so long to grow new trees and grass. Nor do we need off road vehicles tearing up the terrain (even one who really knows camping and the outdoors and understands nature, know what damage is created by these vehicles and log timbering operations).

Sincerely,
Margaret L. Johnson,
6700 Junction La
Los Cruces, NM 88005

134-1

We appreciate your concern relating to the timber harvest level and the road construction level proposed in the original Proposed Action Alternative. We have made several changes to the Proposed Action Alternative including a reduction in the timber allowable sale quantity and road construction. Please see the Proposed Action Summary of Changes in the front of the public comment document for a summary of the changes.

You also indicated a concern for ORV use of the Forest. As long as significant resource damage is not occurring, ORV use is a legitimate recreation use of 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 135

000135

GILA NATIONAL
FOREST

OCT 04 '85

DATE RECEIVED

7227 N Mesa #1301
El Paso, Texas 79912
October 3, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin,

I am writing in response to the draft Gila National Forest Management Plan and DEIS. It is my opinion that the two WSA's should have been given wilderness recommendation. We need more wilderness protection, not more timber harvest from desert forests!

Thank you for your consideration

Sincerely,

Burke

FOREST SERVICE RESPONSE TO LETTER 135

135-1

Thank you for your comment.

LETTER 136

Mary Howlin
P.O. Box 96
Mesilla, N.M. 88046

10-2-85

Forest Supervisor, Gila Natl. Forest
2610 North Silver Street
Silver City, N.M. 88301

Dear Sir

A quick short note to let you know that I am not in favor of the Gila Natl. Forest's draft management plan's 'preferred alternative' which would allow increased logging and road building in now roadless areas that are undisturbed. I am in favor of keeping the roadless areas in the Gila protected for future wilderness and roadless designation.

Thank You Sincerely,

Mary Howlin
Mary Howlin

GILA NATIONAL FOREST
Silver City New Mexico

OCT 04 '85

DATE RECEIVED

000136

FOREST SERVICE RESPONSE TO LETTER 136

136-1

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 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, 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 85 percent of these roads would be closed after timber activities are completed. Please refer to the Proposed Action Summary of Changes at the beginning of this document for additional details concerning the revised timber program.

136-2

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 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 Summary of Changes for additional details concerning undeveloped areas on the Forest.

LETTER 137

FOREST SERVICE RESPONSE TO LETTER 137

Paul & Cheryl Blevins
5915 Quesenberry Lane
Las Cruces, N.M. 88005 000137
10-3-85

GILA NATIONAL FOREST
Silver City, N.M.

OCT 01 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City, N.M. 88061

Dear Sir

We are writing to protest the U.S. Forest Service draft management plan "preferred alternative" for the Gila. We oppose the increased timber harvesting and road building that would occur as a result of adoption of the "preferred alternative" put forth in the plan.] 1

Much of the area slated for development is 'de facto' wilderness area adjacent to existing designated wilderness areas. These potential wilderness and roadless areas should be protected now for future designated status. The population of the U.S. is increasing and the Southwest as a region will experience more population growth in the future. We will need these wilderness areas preserved for future generations as a refuge from our people's increasingly urban environment. We ask you not to think just 10, 20, or 50 years down the road, but thin of now to indefinitely into the future. We will need all the natural environment we can get.

Other reasons we oppose the Draft Plan's "preferred alternative":

- * The plan would result in much road in now roadless and undisturbed areas, which would increase erosion. ORV'S would thus be given access to the area, and Off Road use would further increase erosion. There will be more ORV'S in the future, with more population, thus even more damage. (We own a 4WD, but this is not the place for it.) Increased erosion would damage watersheds and fish and stream habitats.] 2
- * Regrowth rates in the arid Southwest are slow- many years will pass before the land will recover and it will not return to a wild state if roads are built into the area. Soil stripped of its vegetative cover and exposed to the desert sun is more sterile.] 3

137-1

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. Average production over the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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 Summary of Changes at the beginning of this document for additional details concerning the revised timber program.

137-2

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 produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

137-3

Thank you for your comment. The Plan is predicated on the National Forest Management Act. Those areas that are slow to recover or cannot be revegetated have not been included in the timber management base. As a result of public comment, the sawlog harvest has been reduced from 35 MMBF to 30 MMBF and will remain constant through time. This in turn would result in a significant reduction in road construction.

Timber harvesting in this area is uneconomical. It cost us, as taxpayers }
 \$2.5 million over the last five years. It would cost less to leave this }4
 area alone. The Gila is a desert forest that is not meant or capable of
 providing sustained timber harvesting. We frequently visit Washington
 state and British Columbia, Canada, where logging is practiced on a large
 scale. Much of the waste they leave behind after clearcutting would be
 considered 'logs' from mature tree species found in the Gila. Let's save
 our money.

We favor wilderness designation for Lower San Francisco Canyon and Hells }5
 Hole.

137-4

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, 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 to accurately

evaluate total costs and benefits of individual timber sales. All things 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.

137-5

We have reevaluated our recommendation concerning the designation of the two wilderness study areas and continue to support the nonwilderness designation based on the rationale presented in the Proposed Action Summary of Changes section of this document.

LETTER 137

FOREST SERVICE RESPONSE TO LETTER 137

137-6

We favor managing as roadless and undeveloped areas (for primitive and non-motorized recreation and wildlife protection habitat) areas adjacent to the Aldo Leopold Wilderness (173,160 acres), areas along the Mogollon Rim from the Blue Pange to the Gila Wilderness (125,855 acres), wilderness candidate areas such as Frisco Box (40,350 acres) and Eagle Peak (30,380 ACRES).

The Lincoln National Forest has many roads through it and much development; let's not make this a model for the Gila. We have much camping and hiking in the Gila area and have found much needed peace there. We hope to soon take our young nieces there for a similar experience—far from the world of Cabbage Patch Dolls and T.V. We hope our future generations can enjoy this with us and long after we have both left this earth.

Thank You Sincerely, *Paul Blewins*
Luylt Blewins

We have sent copies of this letter to our Congressmen.

Of the approximately 698,000 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 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 effected by development activities during the first decade. Areas not developed would be managed to maintain 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	89,595	2,500	3%
Holan	11,630	0	0%
Aspen Mountain	19,510	1,907	9%
Mather 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%

138-1

As a result of public response, the Plan has been changed to hold timber harvest activities at the current level [30 MMBF per year]. This will result in a reduced cable logging program and a reduction in the need for road construction. Road construction or timber harvest is prohibited within designated wilderness areas. Cable logging on steep slopes cause less soil disturbance than conventional harvest methods. Harvest practices will maintain sufficient trees to provide growing stock for the future and prevent extensive soil loss from the site.

Forest Supervisor
Gila National Forest
2610 N Silver St
Silver City NM 88061

3 October 1985
6700 Justin Lane
Las Cruces NM, 88045

000138

U.S. NATIONAL FOREST
Silver City New Mexico

OCT 04 1985

DATE RECEIVED

Dear Sir,

I wish to register my disagreement with the preferred alternative plan for the Gila National Forest.

The increase in lumbering with the resulting roads thru this wilderness area will lead to erosion that cannot be stopped in the future. We do not have enough rain fall here to be able to consider timber as a crop! The areas available have terrain so steep that reforestation would be nearly impossible and most of the seedlings would be washed away with the soil when it does rain. I believe this ecology is too fragile to allow such activities without permanent injury to the land, the water supply and the wildlife in the area.

True wilderness areas are scarce & made out of it. I hope to

wrecking one of the few that do exist. We don't need to have the area opened to off-the-road vehicles so that they can tear their own trails and roads in the fragile ground cover. We can still see tracks made by such vehicles just driving over the ground cover 20 years ago, it is that fragile! We should keep those areas which are now wilderness wild!

I would like to see the lower San Francisco Canyon and Hells Hole included as wilderness areas. Please register this complaint to the proposed plan and eliminate the thought of such uneconomical logging operations in our wilderness areas.

Thanks for your time
John F. Dickerson

cc. Sen. Pete Domenici
Sen. Jeff Bingaman
Rep. Joe Skeen
4-1-71

138-2

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 produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

138-3

We have reconsidered the nonwilderness recommendation of the wilderness study areas between the draft and final plan and continue to support the nonwilderness recommendation based on the rationale presented in the Summary of Changes section.

LETTER 139

FOREST SERVICE RESPONSE TO LETTER 139

000139

715 Taylor Road
Las Cruces, New Mexico 88005
October 3, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico

Dear Sir

We wish to oppose the draft management plan for the
Gila National Forest which calls for increases in timber harvests
and road construction. The timbering and road increases are
1) uneconomic, 2) damaging to other forest uses and values, and

] 1
] 2

139-1

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, 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 to accurately evaluate 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.

139-2

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.

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 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 degrade that supply.

LETTER 139

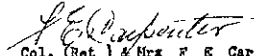
3) destructive of remaining wildlands. We also urge that the key remaining natural areas must be kept roadless.

3

This land is one of the most cherished areas in the U S. and once desecrated would never again be the superb wilderness it is now.

We fervently hope that you receive enough evidence from aroused citizens to prevent the disastrous proposed action by the U S. Forest Service.

Sincerely yours,


Col. (Ret.) & Mrs F E Carpenter

COPIES SENT TO NEW MEXICO REPRESENTATIVES AND CONGRESSMEN

FOREST SERVICE RESPONSE TO LETTER 139

139-8

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 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 699,015 undeveloped area outside of classified Wildernesses. In the first decade the proposed alternative will result in the development of approximately 20,600 acres (three 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 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 then be reconsidered for wilderness designation.

348 Higley Circle
Horizon City, TX
79927
October 2, 1985

000140

614A NATIONAL FOREST
Silver City, New Mexico

OCT 03 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico
88061

Dear Sir:

In reviewing your Draft Environmental Impact Statement for the Gila National Forest, we find Alternative "F" to be the best economical and environmental alternative in all cases.]

We feel that as taxpayers there should be no logging in National Forests. We feel that logging in National Forests as it is being currently done is subsidizing the logging industry at the expense of the taxpayers and the environment.]

We encourage you to reconsider your decision not recommending the two Wilderness Study Areas for Wilderness status. We feel strongly that both of these areas deserve protection.]

Thank you,
Theodore C. Mertig
Barbara Mertig

140-1

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.

140-2

As a result of public comment, the timber harvest data projections were reanalyzed. As a result of this re-analysis, the timber harvest has been reduced from 35 MMBF in the first decade to 30 MMBF. This harvest will remain at this level throughout time.

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, recreationists, timber contractors, 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.

140-3

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation. The rationale supporting this recommendation is presented in the Proposed Action Summary of Changes section of this document.

000141

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO

OCT 03 '85

DATE RECEIVED

137 Villa Cantu
Silver City, NM 88331
Sept 30, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88331

Dear Mr. Forester

I am writing in response to the draft
Gila National Forest Management Plan and
BLIS

I am opposed to more logging and
more roads in the Gila National Forest
to "open the natural environment with
economic investment."

Thank you for your consideration
(Sincerely,
)

141-1

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. Average production from the Gila National Forest over the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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.

141-2

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 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, 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 to accurately evaluate total costs and benefits of individual timber sales. All things 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.

LETTER 142

FOREST SERVICE RESPONSE TO LETTER 142

142-1

24 Sept 85

000142

Mica Eichel
2445 McKinley #16
El Paso, TX 79930

U.S. NATIONAL FOREST
Box 61 Silver City, NM

OCT 03 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Gentlemen

I am writing this in response to the Gila National
Forest Management Plan & DEIS.

The plan seems to be based on projected timber
and grazing revenues which are overly optimistic.
and projected plan should be realistic with more
realistic estimates of a sustainable forest in mind
instead of whatever motivates this plan

Let it be more fitting to the forest of this
region, not the forest to fit the planning model

Thank you for your consideration,

Sincerely,

M. Eichel

Thank you for your comment. In the initial stages of the planning process, public meetings were held to determine the issues and concerns that would affect the Gila National Forest management. Since grazing and logging affect the livelihood of area residents and communities, these issues surfaced to be addressed in the planning process. As a result of public comment on the Proposed Plan, the Proposed Action Alternative has been revised to reduce the annual timber harvest from 35 MMBF to 30 MMBF. This harvest would remain constant through time. The Plan proposes the reduction of permitted grazing use by 33,000 AUM's by the end of the second decade.

LETTER 143

7138 Mt Sam Bender
El Paso, TX 79924
September 26, 1985

Kenneth Scoggin,
Forest Supervisor
Gila National Forest
2610 North Selma Street
Selma City, NM 88061

000143
GILA NATIONAL FOREST
Silver City, New Mexico
OCT 03 '85
DATE RECEIVED

Dear Mr. Scoggin

I am concerned about certain aspects of the
draft Gila National Forest Management Plan and
DEIS

First, I feel that the Gila has been overgrazed in
the past, and that continuing this practice amounts
to planned abuse of a delicate environment
Second, I feel we need less timber harvest
rather than more. This area needs protection,
not exploitation, especially on steep slopes!

I feel that the two WSA's should have been
given wilderness recommendation. I am a
backpacker who sees many parts of the Gila
which the general public has no knowledge of.
Please don't let our wilderness areas be eroded
by governmental plan (or careless planning)

(Yours truly,
Sue Le Bahra

FOREST SERVICE RESPONSE TO LETTER 143

143-1

The Proposed Action Alternative proposes to balance permitted numbers with capacity by the end of the second decade. Please refer to the Proposed Action Change Summary located at the beginning of this document for additional information concerning the range program.

143-2

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 over the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54 MMBF.

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 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 58 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 their use on less than 40 percent slope areas. This could have positive environmental benefits.

143-3

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation. Please refer to the Proposed Action Change Summary at the beginning of this document for the rationale concerning this recommendation.

144-1

Thank you for your comment. Please refer to the Proposed Action Change Summary located at the beginning of this document for information concerning the road program proposed as per the revised Forest Plan.

W. J. Hahn
5131 Raintree
El Paso, TX 79924

000144

NOV 10 1980
SILVER PT
OCT 10 1980
DATE RECEIVED

Forest Supervisor
Gila National Forest
7610 North Silver Street
Silver City, NM 88061

Dr Mr Scoussun,

I am writing in response to the draft Gila National Forest Management Plan and DEIS.

The Gila needs better management to preserve it, rather than more roads. Let's make sure that we don't ruin this wonderful wilderness area!

I would like to see a more detailed outline of the management plans.

Sincerely,

W. J. Hahn

LETTER 145

FOREST SERVICE RESPONSE TO LETTER 145

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 03 '85

DATE RECEIVED

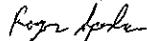
000145

213 Argonaut Dr. #86
El Paso, TX 79912
1 October 1985

Dear Sirs,

For the present 10-year planning cycle the best choice
appears to be Alternative PA. After that planning cycle the
best choice appears to be Alternative E, unless timber sales
can be shown to net the Forest Service more money than it
expends for road preparation, etc.

Sincerely,



Roger Sperka

145-1

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. Average production from the Gila National Forest over the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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.

145-2

Alternative E is not as successful at responding to issues and concerns as the Proposed Action Alternative.

501 W. Main St
El Paso, Tex 79932
Sept 25, 1985

Forest Supervisor:
Gila National Forest
2610 North Scher St
Silver City, NM 88061

Dear Mr. Soggin
In response to the draft Gila National Forest
Management Plan and DEIS

We do not need more roads
loggers, miners and grazing right in
our National Forest. Please focus your attention
on our wilderness and keeping it the way
God made it

Thank you for your consideration
Yours truly
Joseph M. Caldwell

000146

GILA NATIONAL FOREST
Silver City New Mexico

OCT 03 '85

DATE RECEIVED

146-1

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. Average production from the Gila National Forest over the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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.

146-2

The right to mine on federal land is guaranteed by the 1872 Mining Law. Project reclamation is monitored and enforced, however.

146-3

The Proposed Plan would reduce grazing by 33,000 AUM's by the end of the second decade. This effort would balance capacity with permitted numbers.

LETTER 147

FOREST SERVICE RESPONSE TO LETTER 147

147-1

It is true that grazing problems still exist in some management areas on the Forest. The Forest Plan addresses management of all rangelands for multiple uses and the resolution of problems where they presently exist.

147-2

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 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.

10513 Candlewood

El Paso, TX 79925

September 25, 1985

Forest Supervisor
Hila National Forest
2610 N Silver St
Silver City, NM 88261

I am in Decogen,

I am writing in response to the letter from
National Forest Management Plan and O&S.

I feel the Hila is being recognized. Alternative F
is the best alternative not only from an economic
point of view but also from a biological and cultural angle.

I thank you for your consideration.

Sincerely,

James Olson

000147
HILA NATIONAL FOREST
SILVER CITY, NM 88261
OCT 03 '85
DATE RECEIVED

000148

5844 Normant Way
El Paso, TX 79912
Sept 25, 1985

GILA NATIONAL FOREST
Superior Co. " " " " Mexico

OCT 03 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City, NM 88061

Dear Mr. Scroggin,

I am writing in response to the draft Gila National Forest
Management Plan and DEIS.

The title has been overpraised in the past and I am
surprised that the BLM does not take drastic steps to stop this
practice immediately. While I believe in and support the
multiple use concept, this plan seems to allow multiple abuse

Thank you for your consideration

Yours truly,
Mark Post

148-1

We appreciate your concern 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.

LETTER 149

FOREST SERVICE RESPONSE TO LETTER 149

ROSENBERG SHULER MURPHY & MEYER
ATTORNEYS AND COUNSELORS
314 WEST MARCO STREET
POST OFFICE BOX 1597
CARLSBAD NEW MEXICO 88221 1597

000149
TELEPHONE
(505) 885 4163

October 2, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Re Gila National Forest Draft Plan
and Environmental Impact Statement

Dear Sir

I used to live in Silver City and my wife's parents live in White Signal, just outside Silver City. We, therefore, are very interested in the plans for the Gila National Forest.

I strongly request Alternative F be selected. There is no need for any more, or any significant amount of more, roads into the Gila, especially if just for logging activities. I understand that the Government is not even making any money on the logging. Further, there are already a lot of roads into this environmentally sensitive and incredibly special area.

The National Forest needs to be protected with a minimum amount of unnecessary intrusion so that this area will be available for future generations of humans and for present and future generations of other animals and plants. It is in our, the humans, interest and it is also our obligation, to preserve and protect these very special areas containing so much wildlife.

GILA NATIONAL FOREST
SILVER CITY, NM
OCT 03 '85
DATE RECEIVED

149-1

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.

149-2

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. Average production from the Gila National Forest over the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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.

149-3

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 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 699,015 undeveloped area outside of classified Wildernesses. In the first decade the proposed alternative will result in the development of approximately 20,600 acres (three 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 would still be undeveloped when the plan is redone in 10 to 15 years.

As a result of the changes in timber allowable sale quantity and the consideration given to maintenance of unroaded areas, old growth habitat is expected to decline only lightly in the first decade. Wildlife objectives would also be integrated into timber sale planning. Habitat distribution and carrying capacity is expected to increase over time.

I also request that the two Wilderness Study Areas be recommended for]₄
Wilderness Status

Thank you for your consideration of my comments

Very truly yours,



Robert N. Meyer

RNM/gc

149-4

We have reevaluated our nonwilderness recommendation for the two wilderness study areas on the Forest and continue to support the nonwilderness recommendation based on the rationale presented in the Proposed Action Change Summary located at the beginning of this document.

Please review the Summary of Changes section for more revised Plan information.

The Halls 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 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 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 Halls 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 increase 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 indicates that the majority of this use occurs in the area where Big Dry Creek empties into 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 non-wilderness recommendation.

Even though the present recommendation on 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.

LETTER 150

FOREST SERVICE RESPONSE TO LETTER 150

150-1

As a result of public comment, the timber harvest data projections were reanalyzed. As a result of this re-analysis, the timber harvest has been reduced from 35 MMBF in the first decade to 30 MMBF. This harvest will remain at this level throughout time.

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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). 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 must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by looking solely at the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the process are considered, no meaningful conclusion can be reached.

150-2

You continue by identifying several factors that you feel will be affected as a result of timber activities, including erosion and degradation of the region's water supply.

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. 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 degrade that supply.

In response to your concern regarding the protection of classified wilderness and existing undeveloped areas on the Forest, no activities are or ever will be scheduled in classified wilderness that would result in loss of classified wilderness acres. Please refer to the Proposed Action Summary of Changes section of this document for a discussion of what is being proposed for those areas that are currently undeveloped but available for multiple use activities.

150-3

We have reevaluated our recommendation for the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale presented in the Proposed Action Change Summary located at the beginning of this document.

9/30/85

000150

Dear Mr. [unclear],
I'm writing in regards to the draft plan for the Gila National Forest. My feeling is that the Forest Service proposed alternative to plan is by mistake. As with most Forest Service plans of timber, it is uneconomical and more losses for us taxpayers. Also I think that there would be a significant loss of habitat due to the proposed roads and erosion. The water supply may be shut due to seriously degraded. Another factor would be the loss of wilderness land. Protection of roadless areas should be of prime importance in using the Forest.
With this in mind I urge that you support wilderness designation for the Kalla Hole area and the Lower San Francisco Canyon. Both these areas offer prime opportunities for primitive recreation.

Thank you for your time and consideration.

Sincerely,
John Picano
Chiquito, AZ

GILA NATIONAL FOREST
Silver City, New Mexico

OCT 03 '85

LETTER 151

FOREST SERVICE RESPONSE TO LETTER 151

151-1

The Bureau of Reclamation is the lead agency in the Connor dam study. They will be making the decision on the proposal. We will respond to their Environmental Impact Statement when it becomes available for public review. We have forwarded your response to them.

000151

13 Mill Road NW
Albuquerque, N. M.
87120
October 1, 1985

GILA NATIONAL FOREST
Silver City New Mexico

OCT 03 '85

DATE RECEIVED

Forest Service Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, N. M. 88061

Dear Sir

Considering that the Gila River is the last unregulated mainstem river left in New Mexico, and that it supports some irreplaceable environment for birds, fish, and mammals, I feel strongly that it should not be dammed or altered by the Bureau of Reclamation in any way.

Many of the 144 bird species found in the area breed there (116 species of birds have been documented as breeding in the area.) A great many of the bird species are restricted to this part of the state. All in all, this is a very rich avian community and is unique in the lower Colorado drainage.

There are several endemic fish species in the river, which supports one of the most intact native fish communities anywhere in the lower Colorado drainage.

There is an abundance of wildlife utilized for sport and recreation in the Gila-San Francisco basin that will be seriously disrupted or endangered if control plans are implemented.

As a resident of New Mexico for a good number of years, I resent and protest such plans as are being contemplated for damming the Gila River. We have a beautiful and unique state and would like to see it remain so.

Sincerely,

Jean E. Dilley

Jean E. Dilley (Mrs. Neil E.)

000152

September 11, 1985

UNITED STATES
FOREST SERVICE
SILVER CITY, NEW MEXICO

OCT 03 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Supervisor,

This letter is being written to convey my comments for your draft management plan. I oppose the increases in timber harvests and road construction. I very strongly believe that the key remaining natural areas must be kept roadless. I believe that timbering and road increases are 1) uneconomic, 2) damaging to other forest uses and values, and 3) destructive of remaining wildlands. I fully support protection of roadless lands as the best and the highest use of the forest.

] 1
] 2

152-1

In response to public comment, the Plan has been adjusted to reflect less timber harvest and less road construction over the planning period. 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 over the past 10 to 15 years has been 30 MMBF. 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.

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 difficult to measure in economic terms, but 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.

152-2

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 take into consideration geologic erosion rates and soil formation rates.

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.

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 anywhere its minimum viable population level. Change overtime, 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 key to compatibility of change is that the amount and distribution of resulting habitats resemble those which occurred naturally over time.

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.

LETTER 152

I also would like to voice my support for wilderness designation for the Lower San Francisco Canyon and Hells Hole

3

In addition I would like for the following areas to be managed as roadless and undeveloped for semi-private, non-motorized recreation, so that their value is retained for ecological study, recreation, wildlife habitat, and watershed protection:

areas along the Mogollon Rim stretching from the Blue Range to the Gila Wilderness
freestanding wilderness candidate areas, such as Frisco Box and Eagle Peak
areas adjacent to Aldo Leopold Wilderness

4

I urge you to do all in your power to protect our dwindling forest areas

Thank you,

Irene A Zappia

Irene A Zappia
8160 East Broadway, J-5
Tucson Arizona 85710

cc ^{Gov} Tony Araya

FOREST SERVICE RESPONSE TO LETTER 152

152-3

We have reevaluated our recommendation on the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale presented in the Proposed Action Change Summary located at the beginning of this document.

152-4

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 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 Change Summary for details concerning the undeveloped areas.

LETTER 153

FOREST SERVICE RESPONSE TO LETTER 153

153-1

Thank you for your comments. The responses that address your concerns can be found in the responses to letter 152.

000153

September 11, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

U.S. NATIONAL FOREST
SILVER CITY, NEW MEXICO
OCT 03 '85
DATE RECEIVED

Dear Supervisor,

This letter is being written to convey my comments for your draft management plan. I oppose the increases in timber harvests and road construction. I very strongly believe that the key remaining natural areas must be kept roadless. I believe that timbering and road increases are 1) uneconomic, 2) damaging to other forest uses and values, and 3) destructive of remaining wildlands. I fully support protection of roadless lands as the best and the highest use of the forest.

I also would like to voice my support for wilderness designation for the Lower San Francisco Canyon and Halls Hole.

In addition I would like for the following areas to be managed as roadless and undeveloped for semi-private, non-motorized recreation, so that their value is retained for ecological study, recreation, wildlife habitat, and watershed protection:

- areas along the Mogollon Rim stretching from the Blue Range to the Gila Wilderness
- freestanding wilderness candidate areas, such as Frisco Box and Eagle Peak
- areas adjacent to Aldo Leopold Wilderness

I urge you to do all in your power to protect our dwindling forest areas.

Thank you,

Caroline Tompkins

Caroline Tompkins
2615 E. Adams
Tucson, Arizona 85716

cc Gov. Tony Anaya
Rep. Morris Udall

LETTER 154

FOREST SERVICE RESPONSE TO LETTER 154

154-1

Because of the cost involved in harvesting timber on the Mimbres District and because of the low growing sites, none of the timbered areas of the District were allocated to timber production. This does not mean that timber will not be available to your operation. There are several sales planned on the Silver City District within the first 10 years of the Plan. These sales are somewhat larger than your indicated needs; however, if you were to bid and acquire some of these sales, cutting time frames could likely be worked out with the Silver City District. Establishing these time frames is beyond the scope of the Forest Plan.

000154

P.O. Box 47
Mimbres, New Mexico 88049
September 28, 1985

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

Dear Mr. Scoggin:

This letter is in regards to the to your plan being adopted for the Gila National Forest

We have invested a substantial amount of money setting up a sawmill in the Mimbres Valley. This was done on the strength that we would be able to buy timber in the Mimbres District. According to the ten year plan, there is only one timber sale in the whole Mimbres District.

The timber sales we are now participating in are extremely large for a small outfit such as ours. We hope to see Ranger Sales become available for purchase. These size sales would be more to our advantage because of the short time limit to complete a tract and large outlay of money required on the larger sales. There are a number of areas on the Mimbres District of 300-600 MBF whose location would be to our advantage.

On State Highway 61 to Beaverhead there are approximately 2,000,000 board feet between Rocky Canyon and Black Canyon. This is matured timber that should be cut within the next four or five years. By cutting this timber, the dense canopy over the highway would be alleviated. This should help improve the condition of State Highway 61 which is a large problem to the Gila National Forest. Being a permittee holder in the Taylor Creek allotment, the condition of Highway 61 creates a hardship for our traveling back and forth.

Thank you for your consideration of these matters.

Sincerely,

John M. Fowler
John M. Fowler

Hidden Springs Outfitters
 Jerry Matthews
 HCR 188061
 10140 Hwy 188061
 Silver City, NM 88061

September 11, 1985

000155

Dear Mr. Engel:

My outfitter, in cooperation with Forest Service policies and procedures, would like to see a standardized use plan regarding public corral facilities.

These facilities are unused for most of the year and under 50% capacity when they are used, and a few weeks the corrals are actually used to capacity only once or twice per year.

In carrying out liaison-type duties to the Forest Service, we outfitters help to lighten the administrative load by providing information, help, maintain trails and help disperse the public from overusing certain areas. In general, the Forest Service provides a lot of control, safety and supervision to the public as well as educating and complying with wilderness rules.

Because of this, I believe that any outfitter who does not have documented access to any public corral facility, if not already used to 75% or more capacity by public use, then under this proposal there would always be a 25% public use capacity guarantee even in heavy use periods. This would tend to dissuade outfitters from using those public corral facilities during recorded peak use periods but yet leaves the corral accessible for low use times of the year. An environmental impact in other words if an outfitter knows there is a good chance to high public use in any given public corral facility, they may not have access and would choose another alternative at that point. This would help greatly in public dispersal during peak use times.

I believe that this proposal would be beneficial to both the easy to administrate, therefore I would like to have it considered and included in the Proposed Gila National Forest plan.

Sincerely,
 Jerry Matthews

SEP 20 1985
 GILANF

155-1

We agree that outfitter guides provide a valuable public service and aid in achieving distribution of the recreational use within an area. The question of giving priority use or reserving a portion of public corrals for outfitter guides must be judged on a case by case basis. Many of the corrals on the Forest are either range improvements constructed to aid in the grazing of domestic livestock or private corrals authorized to be on National Forest lands by the terms and conditions of a special use permit. There are very few public corrals constructed only for recreation use. We suggest that the responsible district ranger be contacted and a request for use of a specific corral or corrals be submitted. The district ranger will evaluate the request in light of the purpose for the corral and whether the public interest would be served.

LETTER 156

FOREST SERVICE RESPONSE TO LETTER 156

156--1

Kenneth Goldsmith
555 Forest Road
Northford, CT 06472

Sept 24, 1985

000156

Forest Supervisor
Gila National Forest
2610 N Silver St.
Silver City, NM 88061

GILA NATIONAL FOREST
SILVER CITY, NM
SEP 24 1985
DATE RECEIVED

Dear Sir,

I write to express my very strong opposition to the Gila National Forest Proposed Plan. Although I live in Connecticut, I have many relatives in the Southwest and have spent considerable time in National Forests (including the Gila) in Arizona and New Mexico. Unfortunately the Gila NF proposed plan is one of the worst "development at all costs" proposals the Forest Service has offered lately. The plan exhibits an almost ideological blindness to the need for increased resource protection and not exploitation on our National Forests in order to meet the rapidly growing needs of a more urban America.

Perhaps the most objectionable proposal is the planned increase in sawtimber harvest from the Gila NF. The Gila NF is simply not suited for extensive commercial timber harvest, particularly when compared with forestlands in the Pacific Northwest and the Southeast. Not only will the proposed harvest level cause tremendous environmental damage (your proposal for steep-slope harvesting is absolutely outrageous, as is the planned 24% reduction in old-growth acres on the forest), but it will be heavily subsidized by the American taxpayer. The Forest Service continues to show an amazing disregard for the growing national sentiment for ending below-cost timber sales on the National Forests, a sentiment recently reinforced by the Asst. Sec. of Agriculture's decision in Colorado. I strongly suggest a sharp reduction in planned sawtimber harvest if you wish to avoid an immediate appeal of your plan. It is certainly no coincidence that the alternative which proposes the lowest timber harvest level (F) is also the alternative with the highest Present Net Value. I predict that in the future the Gila NF will increasingly be seen as a "non-commodity resource" valued by the entire nation, and I urge you not to try to pre-empt this change through a rapid resource-development strategy.

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 past 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 Forest Management Team has reexamined this projection considering the timber sold in recent years and do not feel that projection of an increase demand over time is warranted. The average volume sold over 14 years includes both good and bad economic conditions for the timber industry. Since a true price quantity demand projection could not be made, 30MMBF has been projected as the demanded level. The benefit values have also been revised downward.

In order to respond to the forest issues, the sawtimber volume of 30MMBF is projected for the first decade. The cubic foot equivalent of this volume would be sustained over time.

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 Forest planning model was constrained to allocate the harvest of no more than 5MMBF from steep slope areas.

156-2

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 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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). These additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are hard to measure in economic terms but they must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by considering only the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the process are considered, no meaningful conclusion can be reached.

156-3

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.

LETTER 156

FOREST SERVICE RESPONSE TO LETTER 156

Similarly, I urge a reduction in grazing levels on the Forest. Even if you manage to match actual use with capacity, the level of grazing you propose will continue to cause severe environmental damage on many areas of the Forest. Remember, these are public lands.] 4

Also, I strongly urge you to recommend the Hells Hole and Lower San Francisco WSAs for wilderness. These are both outstanding areas with public support and few resource conflicts. Similarly, I urge the designation of the Gila and San Francisco Rivers as Wild & Scenic Rivers.] 5


Finally, I have two "methodological" concerns about the proposed plan and draft EIS. First, I have a very hard time believing that the level of soil loss will be less under the Proposed Alternative than under an alternative (F) which has just over one-third the sawtimber harvest level. Second, and more important, your EIS essentially has six "pro-development" alternatives] 6

and only one "non-commodity oriented" alternative. Only one alternative (F) recommends a significantly reduced timber harvest level and the designation of the two WSAs as wilderness. At the least, an alternative emphasizing maximum PNY should be seriously considered. This EIS simply does not meet the requirements for a broad range of alternatives required by NEPA and the CEQ.

Please send me a complete copy of the final Gila National Forest Plan and EIS when it becomes available.

Thank you.

Sincerely,


Ken Goldsmith

156-4

The Proposed Action Alternative will result in an increase in capacity 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 use be reduced from 383,744 AUMs to 350,000 AUMs by the end of the first decade. In addition, the Plan calls for stabilizing riparian habitats and improving wildlife habitats during the same period.

156-5

We have reevaluated our recommendation of the two wilderness study areas and continue to support the nonwilderness recommendation based on the rationale presented in the Proposed Action Change Summary located at the beginning of this document.

156-6

The projected annual soil loss in the Forest Plan is 18,718,000 tons. The projected annual soil loss under alternative F is 17,500,000 tons. In an effort to adequately meet the timber related wildlife activities in Alternative F, more local roads would be constructed on less than 40 percent slope areas. The Proposed Action Alternative logs more steep slope areas requiring fewer roads because of the significantly increased volume of timber per acre on the steep slopes.

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 firewood 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 need to be taken into consideration in order to evaluate the total costs and benefits of individual timber sales. We 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.

In your concern you mention that timber sales cause damage to riparian habitats and erosion.

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.

Riparian habitat condition should actually improve under the Proposed Action Alternative. To clarify our management of these areas, several standards and guidelines have been added to the Plan. These are listed in the Proposed Action Alternative Summary of Change located in the front of the public comment document. Improperly conducted timber sales could have detrimental effects on riparian habitat, but with the Plan standards and guidelines for timber activities near riparian, damage should not occur.

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 degrade that supply.

000157
(preferred alternative)

The new Gila National Forest Plan has increased the proposed timber harvest almost 100% I do oppose this because it is (1) uneconomic - a great loss to the taxpayer.

(2) damaging to the riparian habitat, including steep slopes, and

(3) degrading the regional water supply.

JUL 1 '85

DATE RECEIVED

(4) destructive of the remaining wilderness
by roadbuilding, timbering, and allowing ORV's.

Timber harvesting should not be done at a loss
to the taxpayer, and in areas where it is destructive,
we have backpacked in the Gila Wilderness many times.

- We also support wilderness designation for
- (1) Lower San Francisco Canyon (6,700 acres) and
 - (2) Hells Hole (18,860 acres) both good recreational
(primitive) areas

We also urge that you direct the forest supervisor
to manage the following areas as ^{semi-primitive} non-motorized,
undeveloped, roadless, and ^{semi-primitive} winter habitat.

- (1) areas along the Mogollon Rim from the Blue Range
to the Gila Wilderness (125,855 acres)
- (2) freestanding areas such as the ~~Blue Range~~
Frisco Port (40,050 acres) and Eagle Peak (39,380)
- (3) Areas adjacent to the LaPied Wilderness
(170,160 acres) to extend this wilderness

Sincerely,

Arnold Keskulla

|| Arnold & Carolyn Keskulla

157-4

With the changes made as a result of public concerns [See the Proposed Action Alternative Summary of Change], the development effects on unroaded areas has been minimized. 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 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.

ORV use is presently allowed on most portions of the Forest. Historically, use has not been heavy and significant resource damage has generally not occurred. Because of topography, many of the unroaded areas are not accessible. 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 produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

157-5

We have reevaluated our recommendation on the two wilderness study areas and feel that the nonwilderness recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

157-6

As mentioned in response to your comment number 4, only approximately 3 percent of the existing unroaded area on the Forest would be affected by development activities in the next 10 years. Those areas not developed would be managed to maintain their semi-primitive recreation opportunities. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.

5000 acres 4/8/85
 26 Sept 1985

Forest Supervisor
 Gila National Forest
 2610 N. Silver St.
 Silver City, NM 88361

000158
 GILA NATIONAL FOREST
 Silver City, NM Mexico
 4/30/85
 DATE RECEIVED

Dear Mr. Sargent,

In response to the draft Gila National
 Forest Management Plan and will
 we do not need more roads we do not
 need more ~~roads~~ grazing, we need more
 protection for the existing ecosystems
 of the forest

Yours truly,
 Wade Librango

158-1

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. 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. Because of the changes in the Proposed Action Alternative, only approximately 3 percent of the existing unroaded area on the Forest would be developed in the first decade. Those areas that remain unroaded will be reconsidered for wilderness classification when the Plan is revised in 10 to 15 years.

158-2

The Proposed Plan does not call for increased grazing. In actuality, the permitted use will decrease 38,000 AUM's from the 1980 level used in the Plan.

159-1

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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. Because of the changes in the Proposed Action Alternative, only approximately 3 percent of the existing unroaded area on the Forest would be developed in the first decade. Those areas that remain unroaded will be reconsidered for wilderness classification when the Plan is revised in 10 to 15 years.

10925B Sagebrush
El Paso, Texas 79936
September 25, 1985

000159

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO
SEP 30 '85
DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin,

I am writing in response to the draft Gila
National Forest Management Plan and DEIS

The Gila does not need more roads. What is
needed is a serious consideration of the eco-systems
of the forest. Please consider the ultimate repercussions
of your actions.

Thank you for your consideration

yours truly
Jeanne French

LETTER 160

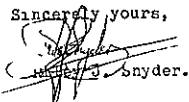
000160

Wiley J. Snyder,
4025 Millmore Street,
El Paso, Texas 79930,
September 26, 1985.

Forest Supervisor,
Gila National Forest,
2610 North Silver Street,
Silver City, New Mexico 88061.

Gentlemen

I wish to go on record as being disappointed in the draft management plan for the Gila National Forest. I believe that the proposed levels for logging and the attendant road building are excessive and do not represent the long term interests of the citizenry. Without belaboring the economic and aesthetic parameters of the plan in detail, I feel that present and future generations would be better served through conservative husbandry with the objective of preserving as much pristine forest as possible.

Sincerely yours,

Wiley J. Snyder.

GILA NATIONAL FOREST
SILVER CITY NEW MEXICO

SEP 30 '85

DATE RECEIVED

FOREST SERVICE RESPONSE TO LETTER 160

160-1

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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. Because of the changes in the Proposed Action Alternative, only approximately 3 percent of the existing unroaded area on the Forest would be developed in the first decade. Those areas that remain unroaded will be reconsidered for wilderness classification when the Plan is revised in 10 to 15 years.

Fair H. Lugeran
 Gila National Forest
 2610 N. Silver
 Silver City, NM 88061

000161
 GILA NATIONAL
 SILVER CITY, NM,
 SEP 30 '85
 DATE RECEIVED

Dear Sir,

This letter is in response to the draft
 Gila National Forest Management Plan and DEIS.
 The plan views steep slope logging as
 a process to get timber to the sawmills.
 Unfortunately, rather than being a cure, it
 will be nothing but trouble. Soil erosion,
 siltation, more endangered species, a less
 scenic forest, etc. Lebanon had its cedars,
 Mill people say, the Gila once had its conifers.
 Thank you for your consideration.

Sincerely,

Shirley J. Phillips
 7304 Oakland
 El Paso, Texas 79925

161-1

As a result of public comment, the timber harvest date projections were reanalyzed. As a result of this re-analysis, the timber harvest has been reduced from 35 MMBF in the first decade to 30 MMBF. This is equivalent to the average volume sold on the Forest in the last 10 to 15 years.

The portion of the volume in the Proposed Action Alternative that would be logged from steep slopes with cable logging systems has also been reanalyzed. In order to respond to the concerns regarding steep slope logging, the volume projected from the steep slope areas was reduced to 5 million board feet for the life of the Plan (10 to 15 years). This is a 41 percent reduction from 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 could have other positive environmental benefits.

The removal of timber from steep slopes using cable logging techniques results in less soil disturbance than conventional logging methods. Cable logging and clear cutting are not synonymous; therefore, the result is no more drastic than prescriptions carried out on gentler slopes. Although soil loss will occur, it will not be enough to affect the long term productivity of the site. Removal of some of the overstory stimulates the understory growth of grasses, forbs, and browse. This in turn creates habitat diversity for various species of wildlife. Additional endangered species will not be created and habitat for existing endangered species will be protected and where possible improved. The intent of the process is to maintain or improve the condition of the site.

1735 Meadow Lane
Las Cruces, NM 88005
Sept. 24, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

000162
U.S. NATIONAL FOREST
Silver City, NM 88061
SEP 30 '85
DATE RECEIVED

Dear Sir:

I've read a number of good arguments
against the Forest Service's draft management
plan for the Gila National Forest. They
all make sense to me, but the one
which makes the most solid sense
is the argument that increasing the
timber harvest (almost doubling it)
over the next fifty years is uneconomical,
+ potentially damaging to watersheds.
Timber harvesting in that area is a losing
proposition now, financially speaking.
The proposed plan appears to throw good
money after bad.

162-1

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. 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 sixty five percent of the new roads constructed would be closed after timber activities are completed. An explanation of these and other changes are described in the Proposed Action Summary of Change located in the front of the public comment document.

162-2

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 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. 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 162

FOREST SERVICE RESPONSE TO LETTER 162

162-3

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.) 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. 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 degrade that supply.

As to watershed damage, New Mexicans
are inclined to be sensitive about any
damage to water supplies.
If timber harvesting is necessary, then
perhaps there are more economical & less

damaging places to do it. Please reconsider.

Sincerely,
Mary Henn

WILA NATION
SILVER CITY

SEP 30 '85

DATE RECEIVED

000163

Sept 25, 1985

Sirs

Here are my thoughts on the 10 yr grazing plan.

1. I paid for that permit. You say it has no value and did not take that into account when figuring my grazing cost I have to. Did you take into account that I am open to the public. Wood workers, hunters, hikers, bikers, skiers, etc. Does any of these people (except the wood cutters) pay anything for the use of gov't land. If not why should I be required to do any of these things to improve the country, I have. How much do they support the local community as much as the ranch industry?

If we get good rains + grow a surplus of grass can I harvest it by holding over a few cows? Can I improve the range by cutting wood in large enough patches to pay for the effort. Not worth out bidding against full time wood cutters.

163-1

We disagree. You purchased the base property and/or the existing permitted livestock which qualified you to be issued a livestock grazing permit. Permits are not a right but a privilege. In order to be able to harvest forage on National Forest System lands, you pay the Forest Service on an animal unit month basis.

The value you paid to the past permit holder for the property or the livestock, may have taken into consideration the fact that the Forest is a multiple use agency and other public uses are also permitted on the land. That was between you and the past owner.

The value used in the Forest Plan for each AUM is \$7.88, considerably higher than the current grazing fee. This value is a willingness to pay value.

163-2

The cost for use of the National Forest for other than personal gain is covered by taxes. Use for personal gain such as fuelwood, logging, or grazing all are approved activities with a permit and a fee required.

163-3

Recreational use of the National Forest and commodity production from the National Forest both affect local communities. The service sectors of local communities such as gas stations, restaurants, and stores sell to recreationists and to local residents. Both of these groups contribute to the local economy.

163-4

Livestock grazing on the National Forest is regulated to supply forage for a permitted number and a set period of time. The number permitted tends to balance with the lands average ability to sustain forage quantity and quality. In conditions of above normal rain fall, a temporary permit can be issued to harvest the excess forage.

163-5

Cutting of fuelwood is an activity that increases the quantity of forage available and provides a wood product that can be used for personal gain. The administration of these products is determined in a manner that will balance the demands and address local issues. The decision to harvest fuelwood is made in the Forest Plan. The method used to sell the product must be fair and provide a fair return.

163-6

If I want to see a little
 about to let some dogs when
 grazed on do you price your farmable
 land cheap enough that cattle can pay
 for it or is it priced like we
 were in the middle of the
 bread basket in a good year?

I know this letter has been
 critical, but you asked for the
 grapes. All is all the Forest Service
 has been fair & not difficult to
 work with

Thanks

Bob Clark

CO5 Ranch

Members Allotment

National Forest lands by their nature are wildlands. Almost no land is cultivatable. Special Use Permits for cultivation or pasture use are discouraged, as they serve individual exclusive interests, as opposed to the general public. Each situation must be evaluated based on its own merit and the decision to issue or not to issue a permit must be determined within the overall management direction that best serves the public needs. Should a permit be issued for cultivation, the cost will be based on existing values of similar crops or land uses.

5804 Normont w,
 C-1 Paso, TX 79410
 Sept 2, 1985

000164

Forest Supervisor
 Gila National Forest
 200 N. H. Silver Street
 Silver City, NM 88061

GILA NATIONAL FOREST
 SILVER CITY, NM
 SEP 27 '85
 DATE RECEIVED

Dear Mr. Scoggin,

I am writing in response to the Gila National
 Forest Management Plan and Dec

More roads in the forest! What the Gila needs is not
 more roads but more intensive management to preserve
 the various ecosystems of the forest. With more &
 more people and cars visiting this place, we need
 to try that much harder to save it. Unless loggers
 are there to help the forest, keep them out. And we
 should stop the cattle overgrazing

Your Friend
 Robert A. Post

164-1

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. The modified Proposed Action Alternative projects a timber harvest of approximately 30MMBF in all decades. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

164-2

The Plan projects reducing the permitted numbers from 383,000 to 350,000 by the end of the second decade. At this point, permitted use will be in balance with forage production. Grazing capacity is developed through Region 3 standard analysis procedures. These procedures generally require three years to complete on each allotment. The amount of analysis that can be completed in any given period is regulated by the number of personnel available to do the job. With the proposed budget to implement the Plan, funding is not available to accomplish the balancing of use and production earlier than the period stated and still provide for the other multiple use outputs and services.

LETTER 165

FOREST SERVICE RESPONSE TO LETTER 165

1609 Sequoia
Las Cruces, N M 88005
Sept 24, 1985

GILA NATIONAL
FOREST

Forest Supervisor
Gila National Forest
2610 N Silver St
Silver City, N M 88061

SEP 27 '85

DATE REC'D

000165

Dear Sir:

There are times when one person seems to make little difference
There are times when a decision made goes unnoticed Then there
are times when a decision sends out ripples of consequences
which have no end There are times when a person in a position
of responsibility can make a lasting difference. Development
of the proposed management plan for the Gila Wilderness is a
good example

Because of your position, you have an opportunity to help make
decisions which will affect all of our future generations

It is interesting to study or observe life and nature in museum
and park settings but infinitely more meaningful and valuable
to experience them in their natural habitat The Gila National
Forest is a beautiful and unique setting which many people
appreciate and enjoy

Our natural resources are precious and quite limited Once a
wilderness area is graded or paved into roads and loses its
virgin forests, its beauty will be greatly diminished or forever
lost

You have an important responsibility Please don't let short-
sighted need or greed deprive my grandchildren and yours of
a special, irreplaceable portion of their heritage

Sincerely,
Barbara H. Hall
Barbara H. Hall

cc Senators Domenici & Bingaman
Rm 41

165-1

Thank you for your comment. We feel that you have misunderstood what the
Forest Plan addresses. It addresses not only the classified Wilderness on
the Forest but also the other portions of the Forest.

The Gila Wilderness and all other designated Wildernesses on the Forest will
be preserved in their natural condition. Wilderness areas are designated by
the Congress and managed under the Wilderness Act of 1965. All forms of
motorized use are prohibited, including timber harvest, fuelwood cutting,
and road building. The approximately 800,000 acres of Wilderness on the
Forest is not proposed for development. Development activities would occur
in other portions of the 3.3 million acre Gila National Forest
administrative unit.

Several changes have been made to the Proposed Action Alternative as a
result of public comment. These are summarized in the Proposed Action
Alternative Summary of Change located in front of the public response
document.

LETTER 166

FOREST SERVICE RESPONSE TO LETTER 166

MAA RATIO-1a, 1
 MAVER DIV II 1

SEP 27 '85

Sept. 26, 1985

DATE RECEIVED

000166

Dear Mr. Scoggin,

First of all, thank you for sending us the Proposed Gila National Forest Plan and Draft Environmental Impact Statement. We find this information invaluable. As landowners and environmentally concerned citizens we appreciate the opportunity to let our opinions be known.

There are many points that I would like to comment to, but the one that bothers me most is the problem of overgrazing. The problem is identified and so a action is proposed, but not nearly enough is being said about it. This is a grave problem and must be met more responsibly by the ranchers and forest service. The forest is a valuable resource, that means that other concerns, such as reservation and recreation must be noticed as well as the interests of the rancher. I have the future generations in mind and I want them to be able to enjoy a forest free of careless destruction, a place to explore free of cow patties, ruined springs by cattle, not only urinating in them, but dying in them as well. There must be more in the way of lowering the number of cattle on acre, raising grazing permit fees, no more responsibility of the rancher in the way of conservation of the forest. Why do we tax payers have to continue to subsidize the stockmen so they can continue to seek out a living and ruin our environment? More must be done in the way of conserving what we have and nurturing back what has been ruined in the past hundred years. We know better than to overgraze, but it is done as a matter of fact, but use of a careless tradition. We can no longer afford to be so careless. If rancher today want their children to

166-1

You seem to have three major concerns in your comment: the first is the level of grazing projected in the Proposed Action Alternative, the second is subsidized grazing, and the third is soil erosion. These three concerns are addressed below.

Overgrazing occurs when permitted livestock numbers are higher than the capacity of the land to provide forage for those numbers. We agree that this situation needs to be corrected and feel that the combination of increasing capacity and reducing permitted numbers proposed in the Plan is the best way to accomplish this goal.

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% 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 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 state in your response that the Forest Service should not subsidize Forest users "at the expense of the American taxpayer". As a matter of principle, we do not believe that it is appropriate to single out Forest Service range permittees 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 by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who 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 actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Gila National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation users, dispersed recreation users, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives of the people; in other words, it is a political decision. The U.S. Forest Service, as custodian of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees are but one among

LETTER 166

grow up to be ranchers, then they had better revise their perspective of grazing or there won't be anything left to graze on.

Another reason I am so concerned about overgrazing is the fact that it leads to soil erosion, that not only depletes the native vegetative growth, but adds so dramatically to flooding. Flooding is very much a part of my family's life as it has taken away precious acreage of our land and as a forester must surely know, it also robs the ground of the valuable top soils. This problem was also addressed, but the attitude was one of defeat with no adequate plan to relieve the problem. I would like to see a more positive program developed to specifically work in this area. In closing, my husband and I strongly urge more emphasis be put on grazing and soil management. Without these we fear the Forest will not be managed properly for the future generations.

Thank you,

Reborah T. Sweetnam
Reborah T. Sweetnam
James R. Sweetnam
James R. Sweetnam

FOREST SERVICE RESPONSE TO LETTER 166

many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

Finally, you express a concern on soil loss. We agree that soil is an important resource. It is the base resource on which most Forest outputs and activities depend. We disagree with your comment that our attitude in the Plan was one of defeat with no adequate plan to relieve the problem. All alternatives improve range condition over time. As a result, all alternatives reduce soil loss over time. The Forest Plan actions will reduce the soil loss on the Forest over time.

LETTER 167

FOREST SERVICE RESPONSE TO LETTER 167

167-1

000167

RECEIVED
FOREST SERVICE
MEXICO

APR 27 '85

DATE RECEIVED

5504 Mount
85 0 0 7 79912
11/18/85

Forest Supervisor
El Nacional Forest
2610 West Silver St
Albuquerque, NM 87101

Dear Mr. Seeger:

I am writing in response to the letter to the National
Forest Management Plan for the N.F.S.

I am sure that you have your preferred
alternative because alternative F is the best
alternative not only from an environmental point
of view but also in other respects and
not just F, but

I thank you for your consideration
Sincerely,
D. J. Carter

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 some of the amenity 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. (See the Proposed Action Alternative Summary of Change located in front of the public comment document). We feel that the modified Proposed Action Alternative provides more net public benefits than Alternative F.

September 24, 1985

Regarding the Proposed 50 Year Plan for the Gila National Forest

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

000168

GILA NATIONAL FOREST
Silver City, New MexicoSEP 26 '85
DATE RECEIVED

It is difficult to see why the PA alternative was selected. Alternative F has the highest benefit/cost ratio, is the least damaging to the forest, and comes closest to supplying the needs of the area for the next 50 years when one considers the high likelihood of significant population growth in southern New Mexico and the associated demand for recreational opportunities. PA appears to be looking backward 50 years rather than ahead 50 years with its heavy emphasis on traditional Forest users and its benign neglect of recreational users.

The material in the Draft EIS, Proposed Gila NF Plan, and the Summary of the Draft EIS is so voluminous that specific comments are difficult. However I will try to briefly express my views on the issues addressed in the proposals.

Issues: Timber and Wood Fiber.

PA has the highest acres logged and the highest volume cable logged. This seems unreasonable in that logging, while desirable as a means of diversifying the age of forest vegetation, appears to be generally damaging by requiring roads in formerly roadless areas with all that entails, and damages the few paved roads in the forest as well as the lightly surfaced county and state roads leading to the forest. Most published data indicates that logging in the National Forests is at best only marginally profitable, so it would seem that logging should be kept to the minimum necessary for cover diversity in the forest. I don't believe the Forest Service has an obligation to meet the needs of fuelwood users. This need will probably decline as larger population centers legislate controls on wood burning to reduce air pollution. In any event fuelwood cutting should be limited to that necessary for good forest management.

In an environment where rainfall is sometimes measured in inches per hour, cable logging would seem inappropriate. Bare slope erosion and erosion problems with the mid-slope roads could be significant. With only 0.08% riparian habitat in the Forest, no logging should be permitted anywhere near these areas.

Range Resources

I was surprised to learn that in many areas of the Gila 30% to 40% of the range is in unsatisfactory condition. Even more surprising is the fact that after the "plan" has been in effect 50 years there will still be areas with a fairly high percentage of unsatisfactory range. Examples: Management Area 5A 63% unsatisfactory now, 49% unsatisfactory in 50 years; Management Area 2D 40% unsatisfactory now, 36% unsatisfactory in 50 years. This looks like bad management in the past and not much better in the future.

168-1

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 does the best at addressing some of 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 more net public benefits than Alternative F.

168-2

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. The modified Proposed Action Alternative projects a timber harvest of approximately 30MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

168-3

We agree. The intent of the Proposed Forest Plan is to place the pinyon-juniper woodland type under management. Currently, one of the greatest uses of fiber produced in this type is for fuelwood. Past demand indicates that production will not meet demand at sometime in the future. Future legislation by population centers may place stricter controls on the emissions from wood burning; however, in the event that alternative fuel prices increase to high levels, technological advances in stove design could keep wood highly competitive thereby sustaining increasing demand.

168-4

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.

168-5

No logging will be done in riparian areas. To clarify our management of these areas a Forestwide standard and guideline has been added that states that "Timber harvest adjacent to riparian zones will be conducted in a manner that will provide for protection of these key areas".

168-6

Range condition is grouped into two main headings Satisfactory and Unsatisfactory. Satisfactory range is that range that is classified Fair and above, and unsatisfactory range is that range classified Poor and Very Poor. The method used in classifying range condition is based on using ecological concepts, ground cover, and plant vigor. In some cases we find vegetation types on poor soils where plant composition and or density can never be rated above poor even though the site may be producing at its maximum ability. For this reason, as you suggest several areas may never be classified satisfactory. Lands that have the potential to improve with improved management will under the current classification methods be classified as fair or above over time.

- 2 -

Range Resources (continued)

While I am not very pleased to see fences in the Wilderness and even less pleased to see cattle, these are legal uses under present law; however I wouldn't object to more fences if they were used to severely limit livestock access to riparian zones. Since these riparian zones support a great diversity of flora and fauna it doesn't seem appropriate to allow livestock grazing and trampling to damage these otherwise very productive environments

When one considers that only 3% of the nation's meat supply comes from ALL of the public lands of the west, and that significant amounts are spent on fencing, water pipelines, stock tanks, and range management personnel, it would appear that livestock grazing is not a particularly cost effective use of our National Forests

Recreation.

Again Alternative F is the most desirable. PA provides too much roaded area and a decrease in non-mechanical recreation. PA in a sense says "OK you backpackers and hikers, you have 1/4 million acres of Wilderness, the other 2 1/2 million acres belong to the ORV's and 4 wheelers." This doesn't sound like a very equitable distribution. I think it is unwise to continue to permit unlimited off road travel on 2 1/2 million acres of the Forest. It is probable that quite a few of those acres could be irreparably damaged by off road motorized activities as has happened in other areas of the country. The State has the good judgement to prohibit off road travel while hunting big game and turkey.

Fewer roads means less road maintenance, and road maintenance seems to be a major problem in the Gila. I don't believe PA adequately addresses the non-motorized recreational needs of a rapidly increasing urban population, particularly when looking very many years into the future. The 2% per year population growth projection used in the plan does not seem realistic. Alternative F with its substantial improvement in fish and wildlife habitat could provide more benefits to communities adjacent to the Forest than would be lost by reductions in logging and grazing under this alternative.

Mining

I would like to see the archaic Mining Act of 1866 drastically revised, but until this happens I believe existing requirements regarding mining should be strictly enforced and regulations pertaining to post mining restoration be rigidly adhered to.

On page 31 of the Summary, several statements sum up the apparent attitude of Forest Management. At present 1183 miles out of a total of 1441 miles of trail are substandard. After 50 years of the "Plan" 1133 miles of trail will still be substandard with only 308 miles rated standard. In the same period, 872 miles of road will be constructed and 1952 miles reconstructed.

The bottom line is the bottom line in Table 15, page 42 of the summary. Alternative F has the highest Benefit/Cost ratio by a goodly amount.

cc Gov. Toney Anaya
Sen. Jeff Bingaman
Sierra Club

Sincerely,

Chet Warwick *Mern Warwick*
Chet Warwick Mern Warwick
Box 1144
T or C, NM 87901

168-7

Protective fencing is very expensive to construct and maintain but it is included in standards and guidelines as a possible method to use to provide for riparian improvement. This method will be used if other methods do not yield satisfactory improvement in low condition riparian areas.

168-8

The use of the National Forest to support multiple uses including livestock is founded in part on the local economic needs not just the 3% at a national level. The costs associated with livestock management and or total Forest Management are very difficult to separate. The additional water developments help in the distribution of livestock but they also provide additional habitat for wildlife. The use of livestock to maintain browse availability, wildlife openings and reduce fire hazards are other good examples where multiple use is working but the benefits and cost are hard to separate.

168-9

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 produce resource damage. Historically, ORV use has been light and has generally not resulted in significant resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use. Even though ORV use has not been restricted in unroaded areas, the topography of many of these areas will limit the accessibility.

168-10

Mining laws can only be changed by Congress. Mining regulations are enforced on the Forest and will continue to be enforced. These regulations provide for management of the surface resource. We will continue to require restoration of areas when the restoration is needed to protect surface resources.

168-11

In response to public comments, trail maintenance has been increased in the modified Proposed Action Alternative.

LETTER 169

FOREST SERVICE RESPONSE TO LETTER 169

P O Box 221
Columbus, N M 88029
23 September, 1985

000169

Forest Supervisor
Gila National Forest
2610 N Silver St.
Silver City, N M 88061

Dear Sir

The issue of the Gila Draft Plan has just come to our attention. We feel that the plan would wreak a real calamity on the whole wilderness.

There are many reasons why such a plan should not be implemented.

- 1 Any increase in timber harvesting would rob the forest of much of its beauty
- 2 The effect on the watershed, wildlife and the roadless wilderness would be devastating
- 3 Opening the area to roads and for off-road type vehicles would leave the area in shambles

169-1

The Forest Plan has been revised following public comments. The Plan projects timber harvest to continue to remain at the present level of activity. The timber harvest program yearly affects a very small area of the total land area of the Forest. Timber harvest activities cause temporary incursions where natural beauty is concerned. The opening of the forest canopy stimulates the growth of grasses, forbs, and browse, thereby creating habitat diversity.

169-2

In your concern you mention several factors that you feel will be effected as a result of timber activities. These include watershed, damage to wildlife habitat 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. Management activities in the Proposed Action Alternative that result in continued improvement in the Forest's range resource will result in an improvement in watershed condition over time.

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% reduction in old growth habitat. This should provide substantial amounts of habitat for wildlife that requires high serial stage timber areas.

As a result of changes made to the Proposed Action Alternative, most of the unroaded acreage on the forest will continue to be available for semi-primitive recreation. 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.

169-3

The ORV restrictions proposed in the Plan are basically the same as the existing restrictions on the Forest. ORV use is not allowed in the classified wilderness areas.

ORV use is recognized as a form of recreational experience. ORV recreation use has historically been light and has generally not resulted in excess resource damage. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

LETTER 169

FOREST SERVICE RESPONSE TO LETTER 169

4 It is economically unsound. In the past five years, the program has lost over \$2.5 million, or 23 cents of each dollar spent to sell the lumber.

5 The resulting soil erosion from timbering would adversely affect multiple uses of the wilderness and would degrade the water supply of the area.

6 It would have a 'domino effect' on surrounding wilderness areas.

7 Our children and their grandchildren would be robbed of their heritage.

It has been our experience in working in the National Forests that none of the above reasons has been considered. In one instance, which we witnessed, large companies were given the opportunity of salvaging trees in the forest--those that had fallen to the ground, or old trees in danger of toppling. In fact, the fallen trees were left on the ground, and prime trees were cut--all for \$1.00 per thousand board feet. This might be the reason that the wilderness lost money on selling lumber.

We also witnessed the slashed areas in the forests of the West, and the 'tree farm' of a huge Lumber interest--a scraggly group of sickly-looking trees which were to supplant the harvested trees. In our opinion, this example, is a travesty of public trust.

The loss of trees leads to loss of watershed. Loss of wilderness means loss of wildlife and the opportunity for primitive recreation for those who love and cherish the wilderness areas. The opening of these areas to off-road drivers, who have no respect for the fragility of the land, or for natural beauty, only their own 'macho' image, would be a real tragedy.

Opening roads through the Gila would endanger surrounding wilderness and pave the way for further exploitation.

There are other ways which are advocated by Conservationists:

1 Place in the wilderness area, such as the Lower San Francisco Canyon (6,700 acres), located near Glenwood, New Mexico-- incidentally, a home of the Bald Eagle. Since the area is very fragile, the use of off-road vehicles would devastate it.

2 Hell's Hole (18,860 acres), located south of the Lower San Francisco Canyon--offers good opportunities for primitive recreation.

169-4

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 firewood 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 need to be taken into consideration in order to evaluate the total costs and benefits of individual timber sales. We 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.

169-5

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 degrade that supply.

Timber harvest will not occur in classified wilderness areas. These areas are protected by law.

169-6

The modified Proposed Action Alternative effect on unroaded areas was summarized in our response to your comment number 2. The development effects on individual areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 169

3 keeping the following areas roadless, so as to retain their value for ecological studies, wildlife habitation, and watershed protection areas along the Mogollon Ridge Frisco Box, and Eagle Peak as well as adjacent areas of the Aldo Leopold wilderness

Copies of this letter are being sent to Governor Anaya, Senators Bingaman and Domenici, Representative Keen, and to the Wilderness Society and the Sierra Club.

We hope you will convey to your superiors in the Department of Agriculture these ideas

Sincerely,

Wm. L. Egan
Ch. F. Egan

LETTER 170

FOREST SERVICE RESPONSE TO LETTER 170

9-24-85
Gus F. Bigelow
P.O. Drawer P
Anthony, N.M. 88021

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

SEP 26 1985

000170

Following are my comments on the U.S. Forest Service draft management plan for the Gila National Forest issued in June 1985. My wife and I as conservationists oppose the use of the Gila and its surrounding areas for the short term economic gain of the timber industry. We also oppose it for more direct reasons. I because it would limit the backpacking opportunities my sons and I have enjoyed for over 20 years in the Gila and my wife because as a licensed raptor rehabilitator she frequently releases rehabilitated eagles and other raptors on the San Francisco River.

I have witnessed the construction of roads in a similar area in New Mexico in the Weed area of the Sacramento Forest. The horror stories predicted for the Gila by conservationists are well founded in the history of that area. Destruction of habitat, erosion, etc., it all occurred and the forest will never recover. Our first experiences in backpacking were in the Sacramento and we had to abandon that area because of logging activities.

The reason that my wife releases raptors on the San Francisco River is because the habitat is close to ideal for them. (She is licensed by the way by New Mexico and Texas Game and Fish Departments and by the U.S. Fish and Wildlife Service.) Should the Gila be opened to logging there would be no place to release rehabilitated eagles within literally hundreds of miles.

We need more wilderness area in New Mexico, not less. The Gila Wilderness is already at its capacity of backpackers and other users. The areas under consideration for logging and roads should be developed instead for recreational uses. Building roads and logging will result only in subsidizing an uneconomical enterprise with public taxes. I object.

More specifically I object to your plan to develop and build roads in these areas. Along the Popolon Rim, the Frisco Box, Eagle Peak and areas adjacent to Aldo Leopold Wilderness. I also support the inclusion of the Lower San Francisco Canyon and Pells Hole into the wilderness area with a wilderness designation.

Thank-you for your consideration in this matter and please keep me informed on the progress of your draft plan.

Gus F. Bigelow
Gus F. Bigelow
Helen A. Bigelow
Helen A. Bigelow

170-1

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. 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 the new roads constructed would be closed after timber activities are completed.

You also state in your comment that the Gila Wilderness is already at its capacity for backpackers and other users. We disagree. Our information indicates that the capacity of the wilderness substantially exceeds the existing use levels.

170-2

As a result of changes made to the Proposed Action Alternative, the development of unroaded areas has been reduced. 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific areas has been displayed in the Proposed Action Summary of Change located in the front of the public comment document.

170-3

We have reevaluated our recommendation on the two wilderness study areas and feel that they the nonwilderness recommendation is still appropriate. The rationale for our recommendation is included in the Proposed Action Alternative Summary of Change. Even though these areas are recommended for nonwilderness, no development activities are planned. The areas will be managed to maintain their semi-primitive recreation opportunities and will be reconsidered for wilderness when the Plan is revised in 10 to 15 years.

LETTER 171

000171

September 22, 1935

Forest Supervisor
Gila National Forest
2810 North Silver Street
Silver City, New Mexico 8061

Dear Sir:

I was dismayed and incredulous to learn the contents of your "preferred alternative" draft management plan for the Gila National Forest. In stead of decreasing lumbering activities in order to save what's left of the beautiful wilderness area, which contains water fed to protect the riparian area, with a supply and uncontrolled opportunities for recreational uses, the plan calls for increased lumber production. In addition, there is a building program proposed. Obviously, the location of prime wilderness should be marked and for view to future generations.

This preferred alternative plan should not be used for a number of reasons:

1. It is unconomical, as timber sales have always been, from the time the area was first settled. It is a tax on the people, and it is a burden on the future generations.

It would be a disaster to the riparian area, which is the source of water for the people of the Gila. It is difficult to see the value of the area.

FOREST SERVICE RESPONSE TO LETTER 171

171-1

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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 sixty five percent of the new roads constructed would be closed after timber activities are completed.

It is important to note that no road or other development activity will take place in classified wilderness. Wildernesses like the Gila, Aldo Leopold and Blue Range are classified by congress and are by law protected from development activities.

171-2

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 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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). These additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by looking solely at the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the process are considered, no meaningful conclusion can be reached.

171-3

Timber harvesting and road building do not necessarily result in excessive erosion and loss of riparian habitat. Sale contracts call for erosion control measures to prevent excessive erosion from skid trails, landings, and roads. The greatest soil loss occurs from areas in unsatisfactory watershed condition. Watershed condition is expected to improve over time as a result of management activities in the Proposed Action Alternative.

You also commented on reforestation problems on steep slopes. Timbered portions of the Forest where reforestation was expected to be a problem were eliminated from the timber base early in the planning process. Reforestation should not be a problem on those areas proposed for logging.

LETTER 171

FOREST SERVICE RESPONSE TO LETTER 171

3. Under the preferred alternative plan off-road vehicles would be allowed to use roadless areas that would not recover from this damage. This, together with lumbering and consequent road building, would eliminate forever the consideration of these areas for possible wilderness designation. Our children and grandchildren will judge us harshly for this lack of forethought!

4

I also hope that you will lend your support to wilderness designation for the Lower San Francisco Canyon (2700 acres) and to Hell Hole (10,800 acres) for which your children will thank you. And I thank you for anything you can do regarding these requests.

5

Sincerely yours,

Wilma Kaselein
 Wilma Kaselein
 128 Calle Corta
 Encinitas, CA 92025

Copies to Gov. Tony Anthony
 Senator Goldwater
 & DeConcini
 Congressman Jim Kolbe

171-4

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 produce resource damage. ORV recreational use of the Forest has historically been light and has generally not resulted in significant resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use. You also mention ORV use and other uses of the Forest as eliminating the Forest's unroaded area. Because of topography, many of the unroaded portions of the Forest are not accessible to ORV recreationists. Changes made to the Proposed Action Alternative have also resulted in fewer development effects on unroaded areas. 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

171-5

We have reconsidered our nonwilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for the nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change.

000172

individuals
in the
26th

26th

26th

Dorothy Friberg
1207 Vista Dr
Socorro, NM 87801
Sept 24, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver St.
Silver City, NM 88061

Dear Sir

When I read the draft management plan for the Gila National Forest, I was stunned. I can't believe that you or anyone who has seen the Gila could want to almost double the annual timber harvest and build 1500 more miles of road. This amounts to welfare for the rich, the big lumber companies. This not only ruins the appearance of the forest but opens it for backpacking, etc. It also makes for severe erosion, one thing that must be stopped.

I heartily oppose both the increased timber activity and the building of roads.

I approve of the designation of the following as Wilderness areas.

- 1 Lower San Francisco Canyon
- 2, Hells Hole

There are other areas which should be managed for semi-primitive, non-motorized recreation.

- 1 areas adjacent to the Antelope Wildernewe
- 2 areas along the Mogollon River
- 3 freestanding wilderness areas such as Eagle Peak and Fresco Box

Sincerely,
Dorothy Friberg

172-1

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 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 the new roads constructed would be closed after timber activities are completed.

172-2

We have reevaluated our recommendation on the two wilderness study areas and feel that the nonwilderness recommendation is still appropriate. Our rationale for the nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

172-3

Because of the changes in the Proposed Action Alternative, the development effects on undeveloped portions of the Forest has been reduced. 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. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.



Continental Divide Trail Society

P O BOX 30002

BETHESDA MD 20814

000173

September 10, 1985

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

Dear Mr. Scoggin

We are pleased to submit these comments on the Proposed Gila National Forest Plan (your ref 1950). Our overall position is that the Plan does not consider alternatives with respect to the location and development of the Continental Divide National Scenic Trail, and that these matters should be the subject of detailed attention and environmental assessment at a later time.

As you know, the Secretary of Agriculture is preparing, but has not issued, a comprehensive plan for the acquisition, management, development, and use of the trail. The Secretary is also required by law to consult with the CDNST Advisory Council with respect to certain matters relating to the trail, including selection of rights-of-way. Decisions about the trail can only be made in the light of these actions.

These principles are uniquely important in the case of the Gila National Forest. We are thoroughly familiar with the terrain from Mexico to Canada and can assure you that nowhere else does any forest with extensive CDT mileage present the challenge that exists in the Gila.

A regional approach is essential to the routing of the Continental Divide Trail in southern New Mexico. This must include consideration of the options for access from the north - either through Quemado or Pie Town. It must involve an examination of the advantages and disadvantages of a terminus to the south at Antelope Wells (via Silver City) or at Columbus (via Deming). Within the Forest, alternative locations need to be considered and, where appropriate, specific treadway should be identified for construction or reconstruction. All of these matters should be addressed in a manner that allows and invites informed public comment. The decisions should be arrived at in terms of the criteria set out in the CDNST management plan as it may be issued. Our studies to date have identified several practical routes which afford outstanding recreational opportunity, with superb scenic, natural, cultural, and historic values, and with an emphasis on the use of existing public rights-of-way. We look forward to sharing this with you as your CDT planning activities progress.

Consistent with these views, we recommend

Plan, p. 41

Add Activity 123

Prepare a plan for the acquisition, management, development, and use of the Continental Divide National Scenic Trail and designate right-of-way within the first decade.

Rationale: a plan is needed and cannot be prepared at this time. (It is assumed that there would be cooperation with the CDNST Advisory Council, the New Mexico State Trail Advisory Committee, and other interested persons and institutions, but this might also be made explicit.)

173-1

We agree with your recommendation in making a firm commitment on the Continental Divide National Scenic Trail (CDNST) within the Plan. It appears that through an oversight, identification of the Trail in terms of final planning and location was assumed but never made clear. We will include within the Plan the following statement:

Activity 123

In cooperation with the Continental Divide National Scenic Trail Advisory Council, The New Mexico State Advisory Committee, and other interested persons and institutions; a plan for the acquisition, management, development and use of the CDNST and the identification of right-of-way needs will be prepared within the first decade.

Plan, p. 57 (and in corresponding places for other management areas)

Delete Activity A01 (Maintain the Continental Divide National Scenic Trail corridor to the visual quality objective established for this management area).

Rationale: the corridor described in the plan is arbitrary and may have very little resemblance to that selected on the basis of careful study. (Additionally, we object to the vagueness of the statement. Just what is the visual quality objective for the CDT corridor intended to be? How is the commenter to know whether this means retention, modification, or something else? The comprehensive management plan will provide guidance that should be applied.)

Plan, p. 83 (and in corresponding places for other management areas)

Delete Activity D01 (Cooperate with the Continental Divide Trail Advisory Committee and the New Mexico State Trail Advisory Committee on the general alignment of Trail #74).

Rationale: the corridor described in the plan is arbitrary and may have very little resemblance to the alignment of Trail #74. (Also, some management areas refer to Trail #74, but there is no such trail in the management area concerned.)

Transportation System Map

Delete Continental Divide Trail Corridor

Rationale: the corridor described in the plan is arbitrary (even though it coincides with the geographic Continental Divide) and may have very little resemblance to that selected on the basis of careful study.

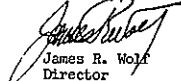
EIS, p. 2

Add a statement (here or elsewhere) recognizing that plans for the Continental Divide National Scenic Trail will require the preparation of environmental assessments (and, if determined to be appropriate, an environmental impact statement).

Rationale: as the present EIS does not consider alternatives or environmental impacts of CDT development, further environmental assessment is required under NEPA.

To repeat: the Gila National Forest presents more complex planning issues related to the Continental Divide National Scenic Trail than does any other national forest. These issues are not, and cannot be, addressed in the present documents. The need for further planning should be acknowledged and provided for. Systematic efforts should be initiated to identify and study alternatives and to designate a selected alternative after full opportunity for public deliberation and comment. Our Society will participate in these activities and anticipates great progress, in cooperation with you and others, in the coming years. If there is any way we can be of further assistance at this time, however, please let us know.

Sincerely,


James R. Wolf
Director

173-2

The selection of the CDNST corridor may appear arbitrary at this point in time. However, in order to effectively respond to potential changes in resource outputs as well as apply some measure of protection to the immediate Trail corridor, it was necessary to formulate something to provide a base for comparison. It is not mandatory that the corridor be located on the true divide. In 1979, when the Gila Forest planning process was initiated, there was virtually no guidelines for assessing the CDNST. As a result, the corridor identified by the Gila National Forest was, and remains largely undefined, but one that provides direction and flexibility to develop prescriptions to complement the potential Trail in the future. It should be pointed out that once a final location has been selected, the potential impacts on various resource outputs should remain nearly parallel to the assessments resulting from the preliminary location. The major difficulty, if any, will be to provide visual protection to the corridor should final location deviate significantly from the true Divide. It is virtually impossible to afford advanced protection when we are unsure of the final location. Regardless of the final location, the same prescriptions will normally apply and a thorough visual analysis will then be conducted and appropriate action taken to insure visual integrity.

The reference to maintaining the CDNST corridor to the Visual Quality Objective established for the management area is intended to provide a reasonable degree of protection to the immediate physical surroundings (1/4 mile on either side of the center). The Visual Quality Objective throughout the entire corridor has been determined to be Partial Retention. This will be identified in the final Plan under each management area which may contain a portion of the CDNST corridor. For each management area containing CDNST, the statement under ACTIVITY A01 shall read as follows:

ACTIVITY A01

Maintain the Continental Divide National Scenic Trail corridor to the Visual Quality Objective of Partial Retention.

173-3

We agree that reference to Trail #74 is meaningless and confusing. We will drop all reference to Trail #74 as it applies to the CDNST. The reference to cooperation in planning will stand as written, under ACTIVITY L23 covered above.

173-4

We disagree that the corridor should be removed from the Transportation System Map even though you feel the location of the CDNST is arbitrary. It is very real in the Forest planning process and, therefore, warrants identification in order to provide individuals with a point of reference.

173-5

The process of determining the need for environmental assessments and environmental impact statements is well established. Virtually any project, regardless of origin, goes through a scoping process. The CDNST would be treated no differently. Once alternative location[s] have been identified, standard procedures for assessing the proposal will be followed. It is not necessary or proper to treat the CDNST as a special project requiring separate status.

LETTER 174

FOREST SERVICE RESPONSE TO LETTER 174



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS TEXAS 75270

000174

174-1

Thank you for your comment.

September 23, 1985

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

RECEIVED
SEP 25 1985
DATE RECEIVED

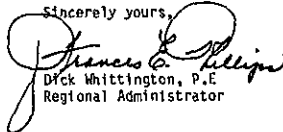
Dear Mr. Scoggin:

We have completed our review of your Draft Environmental Impact Statement (EIS) for the Gila National Forest. The proposed action is a Land and Resource Management Plan for the 3,342,607 acre preserve.

We classify your Draft EIS as Lack of Objections (LO). Generally, we have no objections to the proposed action as discussed in the Draft EIS. Our classification will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions, under Section 309 of the Clean Air Act.

We appreciate the opportunity to review your Draft EIS. Please send our office one (1) copy of the Final EIS at the same time it is sent to the Office of Federal Activities, U. S. Environmental Protection Agency, Washington, D. C.

Sincerely yours,


Dick Whittington, P.E.
Regional Administrator

LETTER 175

P.O. Box 1558
Corrales, NM 87048
Sept. 19, 1985

Forest Supervisor
Gila National Forest
Silver City, New Mexico

000175

Dear Mr. Supervisor:

I am writing to you in regard to the "preferred alternative" in your Draft Management Plan for the Gila Nat'l Forest.

With demand perennially slack for lumber, why does your plan want to increase and encourage logging activities by building more roads in the Gila Nat'l Forest? As you know, roads in this fragile land lead to destruction, whether by nature or by man. (mainly, running water and running vehicles) Besides, the lumber business costs us taxpayers dearly in order to turn a profit for some private logging operation. I believe that the Forest Service should be oriented more toward protecting the public interest, that is, protecting our public forests, whether inside or outside wilderness boundaries you should be preserving the public's treasures there in the Gila country. More specifically:

- setting aside the "Hell Hole", Lower San Francisco Canyon, "Eagle Peak" and "Frisco Box" areas as designated wilderness
- hold road-building and economic activity to a minimum near the boundaries of our official wildernesses in the Gila Nat'l Forest
- the same for a favorite hiking haunt of mine, the dramatic and unique Mogollon Rim.

Thanks for your consideration of my views.

Sincerely,
Jan A. Cummings (Male)
Jan A. Cummings

c c. Pete Dominici

FOREST SERVICE RESPONSE TO LETTER 175

175-1

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. 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 the new roads constructed would be closed after timber activities are completed. Additional changes made to the Proposed Action Alternative are discussed in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

175-2

We have reevaluated our recommendation on the two wilderness study areas and feel that the nonwilderness recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

175-3

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. The development effects on specific areas are displayed in the Proposed Action Alternative Summary of Change.

LETTER 176

FOREST SERVICE RESPONSE TO LETTER 176

176-1

September 20, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM

U.S. NATIONAL FOREST
SILVER CITY, NM

SEP 25 '85

CO PO box 5263
Santa Fe, NM
87051

000176

Dear Sir,

I am writing to protest the forest management plan chosen by the forest service as its "preferred alternative "

The forest service proposes to increase lumbering by 50%. The Gila National Forest already loses an average of half a million dollars a year. So by increasing lumbering, I suppose it wishes to lose even more money.

Thus, in return for subsidizing uneconomical timber harvesting, the American people get vistas of mountains bulldozed into terraces of logging roads, the precious habitat of elk, deer, lion, bear and eagle turned into a dusty, torn-up playground for off-road vehicles to roar around in, soil erosion and the consequent degradation of streams so important to so many creatures especially man who depends on mountain water for drinking and irrigation.

In the foreseeable future El Paso-Las Cruces, Albuquerque, and Phoenix will be much larger places. I say that unspoiled mountain recreation, clean water and tourism will be much more valuable to our state than a little cheap lumber.

I believe that the Forest Service should stick to its traditional multiple use management. Lumbering should be restricted to where it is economical and causes no significant erosion on a sustained yield basis. Almost all larger defacto wildernesses should be left that way. The San Francisco Box and Hells Hole should be added to the National wilderness System.

I have enjoyed the Gila Forest for many years with my family. I hope it remains as beautiful in the future as it is now.

Thank you for your attention,

Richard Kristin

Richard Kristin

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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 decades 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. We feel that these changes and other changes made to the Proposed Action Alternative have resulted in an alternative that better balances amenity and commodity outputs. The changes are explained in more detail in the Proposed Action Alternative Summary of Changes located in front of the public comment document.

Even with these changes, some timber sales will probably not have monetary benefits that are higher than costs. This is because 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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). These additional benefits are derived, at least in part, through the process of harvesting timber. These benefits are hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by looking solely at the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the process are considered, no meaningful conclusion can be reached.

176-2

We have reconsidered our nonwilderness recommendation for the two wilderness study areas and feel that the nonwilderness recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

In addition to the wilderness study areas you expressed a concern regarding the other unroaded areas on the Forest. As a result of changes made in the Proposed Action Alternative, most of the unroaded area on the Forest will remain unroaded until the plan is revised in 10 to 15 years and they can again be reconsidered for wilderness. 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. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 177

FOREST SERVICE RESPONSE TO LETTER 177

177-1

19 September 1985

Kenneth C. Scoggin, Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City, NM 88061

000177

Dear Forest Supervisor

I am writing to comment on the draft management plan for the Gila National Forest. In general, I object to the plan's overemphasis on supporting the timber industry at the expense of multiple use planning and environmental concerns. I also strongly object to your office's failure to involve the public sufficiently in the planning process as required by law.

The preferred alternative violates the policy of "multiple use" by increasing the timber harvest to an extent that will severely and permanently damage watersheds, wildlife habitats, and cultural resources. It violates the policy of "sustained yield" by proposing timber harvesting in areas that cannot be sufficiently reclaimed under existing management guidelines. In addition, the past actions of your

We disagree that we did not sufficiently involve the public in the development of the Forest Plan and in the review of the planning documents. Our intent in the public involvement efforts on the Forest was to satisfy the following goals:

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 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. By providing this opportunity, we gave the public an opportunity to receive additional information and ask questions at their convenience rather than only at our convenience.

We feel that this process was appropriate for our public and met our public involvement objectives. We received over 270 responses on the Plan and Environmental Impact Statement as a result of the process.

177-2

As a result of public comments modifications have been made to the Proposed Action Alternative. (See the Proposed Action Alternative Summary of Changes located in front of the public comment document.) These changes were made to respond to public concerns.

It should be noted that your unsubstantiated claims of severe damage to watersheds, wildlife habitats and cultural resources and your allocation that timber yields would not have been sustainable are not true. Our indepth analysis of the original Proposed Action Alternative indicated that watershed condition would have increased over time as a result of management activities that would have continued to increase range condition. Wildlife habitat diversity and carrying capacity would also have increased. Cultural resources would have been protected. Areas where regeneration would have been a problem were eliminated from the timber base early in the planning process. The volumes proposed could have been sustained from the areas in the suitable timber base. Even though the original Proposed Action Alternative was feasible and implementable and would have resulted in the effects explained in the Draft Environmental Impact Statement, we feel that the changes made as a result of responding to public concerns has made the modified Proposed Action Alternative a more balanced program.

agency, notably on Bearwallow Mountain in the Reserve District, show that you are unable to properly regulate timber harvesting and reclamation on steep slopes where the new plan proposes to increase harvesting. Further, the proposed timber sales are uneconomic as they require an outrageous public subsidy to private industry in unjustified road building that will cause further damage to the environment.

The proposed alternative does not adequately protect wilderness values. The Lower San Francisco Canyon and Hells Hole roadless areas should be immediately proposed as additions to the National Wilderness System, and the roadless areas between the Gila and Blue Wilderness areas (Aspen Mtn, Devils Creek, etc.) and adjacent to the Aldo Leopold Wilderness should be protected until congress and the public make a final decision on their suitability for wilderness protection.

I am not commenting in more detail on the proposed plan because I do not believe that you are seriously interested in what the public thinks. Your office has consistently and repeatedly failed its legislated duty to involve the public in management planning. Three times in the last seven years I sent your office letters requesting information about the planning process and asking to be notified about public involvement. I never received any response until the "final" draft plan appeared. In particular, I was not notified of the public meetings that are required during planning development.

Sincerely,

Kenneth M. Robey
Kenneth M. Robey
121 Tulane Dr NE
Albuquerque, NM
87106

177-3

We disagree that the timber harvest activities near Bearwallow Mountain show that we are unable to properly regulate timber harvesting and reclamation on steep slopes. First, no steep slope areas around Bearwallow Mountain have been logged. Tractors have been used to log sustained slopes of less than 40 percent. We do not agree that we have been unable to manage the activities in this area. Growth rates have been increased in the stands where that was the objective and stands that had regeneration harvests have generally been regenerated. Excess erosion has generally not been a problem. Visually, changes have occurred in the area, but from a timber management standpoint, the management objectives of the timber sales have been accomplished.

177-4

You 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.

177-5

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. Our rationale for the nonwilderness recommendation is included in the Proposed Action Summary of Change.

177-6

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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific unroaded areas are displayed in the Proposed Action Alternative Summary of Change.

177-7

We are sorry if the our public involvement did not seem appropriate to you, but I can assure you that your concerns have been considered in the development of the final Plan. There is no requirement to have public meetings during the development of the plan. The requirement is to obtain public involvement in a method that is appropriate to our publics. As explained in our response to your comment number 1, we feel that we used appropriate methods and had good results. Many changes have been made to the Plan as a result of the public comments.

LETTER 178

FOREST SERVICE RESPONSE TO LETTER 178

000178

428 Lafayette
El Paso, TX 79915
September 16, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Supervisor,

I very much enjoyed my trips in the Gila Forest in the past few months. It has been brought to my attention that there is a proposal for a massive roadbuilding and timber harvest program. Hopefully, the plans for the roadbuilding will be dropped. It is time for the Forest Service to stop this logging industry subsidy of building these expensive and destructive roads.

I was surprised at the unusual cacti and flowers I found in the backcountry last June. Common knowledge indicates that many of these species I observed will come under stress if this road program is undertaken, especially considering the soil erosion that will follow.

I hope you will further consider Hells Hole and Lower San Francisco Canyon for Wilderness areas, as well as adding on to the Gila Wilderness and the Aldo Leopold.

I have game hunting friends that have expressed similar sentiments and you may hear from them also.

Given the fantastic rising national debt it seems most irresponsible that we should continue to subsidize the logging industry by building more roads for them. Furthermore, the dry climate and rugged geography make the Gila National Forest a very marginal timber investment. Hopefully, common sense will prevail and concerned parties will reconsider.

Sincerely,

Neal Nuwash

Neal Nuwash

cc Sen Gramm
Sen Bensen
Gov Anaya
Rep Coleman
Rep Reuben Smith

178-1

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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. The open road density would actually decrease over time.

178-2

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public response document.

178-3

Of the approximately 689,000 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. The development effects on specific unroaded areas is displayed in the Proposed Action Summary of Change.

178-4

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.

179-1

Arline Huernikema Ernst
1885 Evans Place
Los Cruces, New Mexico 88001

000179

Forest Supervisor
Gila National Forest
2610 N. Alameda Street, Silver City NM 88061

Sept. 21, 1985

GILA NATIONAL FOREST
Silver City, New Mexico

SEP 24 '85

DATE RECEIVED

Dear Sir

I am writing to protest increases in logging and
timber harvesting in our beloved, so fragile Gila
Wilderness and other areas in the Gila National Forest.
I utterly protest the plan for the Forest Service to build
1500 or so miles of new roads! When I explained that
I drafted "Plan" of yours to our church group, who were here,
to hear it, I called it "The Rape of the Gila" -- and that's
what it is! We all support protection of wilderness areas in the
face of burgeoning population growth, one; two, who mean to keep in
from the wilderness where trees can be grown better, more
cheaply, in deep-soiled tree farms -- grown, & re-grown, without
destroying that delicate soil in the Gila -- LEAVE IT ALONE!

Most sincerely, and getting a little angry

Arline

Arline Huernikema Ernst

Copies to Senators Bingaman and Domenici, Reps. Lujan, Richardson
and Skelly; Gov. Carona, Forest Supervisor, Gila National Forest

000180

FOREST SERVICE RESPONSE TO LETTER 180

Marilyn Heckman
521 Seleno Dr N.E.
Albuquerque, New Mexico
87108

Sept 20
Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, New Mexico

Dear Sir:

I am against increases in road
construction and timber harvests
in the Gila. I don't think it is
necessary or economical to put
roads into remaining natural areas.

I have only recently discovered
the Gila and value it in its
natural state, or as close to that
as is reasonable.

I also support wilderness designation
for the Lower San Francisco Canyon
and Hell Hole.

Thank you for your attention

Sincerely,
Marilyn Heckman

180-1

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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF. The existing allowable sale quantity is 54MMBF. 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% 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.

180-2

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. The development effects on specific areas is displayed in the Proposed Action Summary of Change located in front of the public comment document.

180-3

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for our nonwilderness recommendation is located in the Proposed Action Alternative Summary of Change.

LETTER 181

PHILLENORE D HOWARD, PH D
1522 STANFORD DRIVE N E
ALBUQUERQUE NEW MEXICO 87106
505 268 8185

000181

September 22, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

GILA NATIONAL FOREST
SILVER CITY NEW MEXICO

SEP 24 '85

DATE RECEIVED

Dear Sir,

The following comments pertain to the draft Gila Forest Plan and EIS. Although I have neither the expertise nor the time to read and comment upon every detail of the plan, as a citizen I have a great concern for the proper management of the Gila National Forest. I have hiked in many different areas of the Gila. In addition, I am a scientist and I have read and evaluated many Environmental Impact Statements and Federal Land Use Plans over the thirteen years that I have resided in New Mexico, so I wish to make some general comments about the approach to forest management which this plan represents, and make a few specific comments and suggestions.

First and foremost, I oppose the timber production emphasis of the preferred alternative. To meet the objective of timber production assigned to this forest, timber production must be maximized while the management of other resources suffer -- wildlife, wilderness, trails, range, recreational facilities. I strongly object to a plan which sacrifices one resource for the sake of development and exploitation of another. Congress mandated multiple use, not maximum timber production and protection of the other resources according to what's left in the budget.

I personally doubt that the sophistication of our scientific knowledge about forest management is anywhere near what is implied in the plan and the accompanying EIS. I will leave to others an evaluation of the likelihood that the Gila Forest is able to produce the amount of timber projected for the preferred alternative, on a sustained yield basis, and an evaluation of the likelihood that logging steep slopes will not adversely impact water quality, species diversity, or wildlife populations. However, given the seemingly arbitrary manner by which timber production quotas appear to have been assigned to National Forests, I strongly doubt that the information currently available can justify the level of timber production proposed, and I urge you to take a very conservative approach to timber production.

The timber production objective of the preferred alternative is imprudent from an ecological viewpoint. The selected plan should be based first and foremost on sound ecological principles, and I find no ecologist on your planning team. Forest management should be conservative, which the preferred alternative is not. The purpose of our national forests is not to improve our balance of payments by producing timber beyond domestic demand, or to artificially prop up local economies, but to protect very valuable renewable resources for longterm production on a truly sustained yield basis, and to protect non-renewable resources such as species diversity and wilderness forever.

Gila National Forest Plan comments, page 2

I object to the extensive development of roads in large unroaded areas. Over the longterm, the ecological benefit of large roadless areas cannot be known with certainty, but our knowledge of ecological balance suggests that they are important. Do we really know all we need to know about species diversity, the value of nongame species, or the needs of nongame species for large roadless areas? Destroy the remaining roadless areas of our National Forests by building roads and cutting timber and it will be too late to learn. The plan states that the preferred alternative severely impacts old growth, cover habitat, turkey roost habitat, and squirrel nest habitat. Almost two million acres are to be managed by prescription G in the preferred alternative -- maximum timber production and declining wildlife populations. This is unacceptable to me, and should be to you.

FOREST SERVICE RESPONSE TO LETTER 181

181-1

We disagree with your conclusions regarding the emphasis levels in the Plan. The original Proposed Forest Plan did not maximize timber. Although the original Proposed Plan was slightly above current harvest levels and increased through time, it did not equal the Maximum Timber Benchmark. The increased timber program was also not developed at the sacrifice of other resources. In the original Proposed Action Alternative, Wildlife habitat diversity and carrying capacity, trail maintenance levels, recreation maintenance and development, range and watershed condition, and wilderness management activities all increased. The alternative did provide for multiple use. Changes made to the Proposed Action Alternative between the draft and final provide for a better balance of use. Please see the Proposed Action Alternative Summary of Change located in the front of the public comment document.

181-2

Timber targets are not assigned in an arbitrary manner as you suggest. They are based on extensive inventories. Consecutive timber inventories have indicated that the standing volume on the Gila is increasing over time. This would not be the case if volume were being harvested above the sustained yield level.

181-3

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 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. Average production from the Gila National Forest for the past 10 to 15 years has been 30 MMBF.

The reasons for these changes are explained in the Proposed Action Alternative Summary of Changes located in the front of the public comment document. The changes were not made because the original Proposed Action Alternative was imprudent from an ecological viewpoint as you suggest. The Forest plan was developed using an interdisciplinary approach and incorporated the ecological knowledge of many specialists including a wildlife biologist, soil scientist, hydrologist, and several other individuals with biological science training. Ecological principles and interrelationships among plant and animal communities existing on the Forest were taken into consideration in the development of the Plan.

181-4

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. This means that only 3 percent of the existing unroaded areas on the Forest would be developed during the life of the Plan. In the original Proposed Action Alternative approximately 36,000 acres would have been developed in the first decade. All areas that remain unroaded will be reconsidered for wilderness when the plan is revised in 10 to 15 years. As you can see from this discussion, between the classified wilderness on the Forest and the undeveloped unroaded areas, large roadless areas will continue to be a portion of the Forest's environment.

181-5

We disagree that the habitats you mention would be severely reduced as you suggest. Even though acres of habitat decline, the distribution of habitats improve and become more useable. The result would be an increase in wildlife, not the decline that you suggest.

The DEIS contains a reasonably good discussion of nonpriced benefits (page 52). However, not nearly enough is said about longterm nonpriced costs. Inadequate consideration was given in the preferred alternative to the longterm cost (beyond 50 years) of soil erosion, diminished soil development because of the removal of vegetable matter, water quality deterioration, declining forest productivity beyond fifty years. Another factor ignored in the plan is the cumulative effects of all of these costs nationwide, as every forest is managed for maximum (or excessive) timber production.

A glaring deficiency of the DEIS is that no rationale is given for failure to recommend Lower San Francisco Canyon and Hells Hole WSAs for wilderness status. Given the bias of this administration against wilderness, I suspect that this was a subjective decision, not based on facts about the wilderness quality of the areas. In addition to supporting wilderness designation for these areas, I strongly support protection of other de facto wilderness areas as roadless and undeveloped, including the Mogollon Rim, Frisco Box, Eagle Peak, and areas adjacent to the Aldo Leopold Wilderness, as specifically proposed by the Sierra Club and the Wilderness Society.

The consumptive bias of the Forest Service is so evident in the treatment of wilderness and wildlife. Wilderness is clearly viewed as a resource to be used for recreation, rather than as a part of the life support system of the earth -- to be kept as closely as possible in its natural state. The "benefit" of wilderness is measured in visitor days. Similarly, wildlife is clearly viewed as a resource to be "grown" like timber to be harvested, rather than to be protected as a living part of our natural heritage. Its value is measured in terms of recreational hunting days provided. Admittedly, our techniques for assigning a "benefit" to amenity values are rudimentary, but somehow when we get caught up in cost/benefit analysis, and net present value (or present net value as you call it), we lose sight of some very important nonquantifiable values of our natural heritage.

I 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

181-6

The long term costs of soil loss were considered in the development of the Plan. Soil loss was mitigated so that the soil loss will not exceed soil tolerance levels (the soil loss level at which long term productivity is lost). You also refer to the costs as a result of diminished soil development because of the removal of vegetable matter.

Soil development and nutrient loss as a result of removing vegetation from the environment has been discussed for many years. Research is not conclusive on this issue and does not provide methodology for measuring the possible effects. As a result, there was no way to quantify the effects during this cycle of planning. If methods to quantify these effects are developed, the analysis can be included in the evaluation of alternatives when the Plan is revised in 10 to 15 years.

181-7

The Draft Environmental Impact Statement contained a Proposed Action Alternative. This Proposed Action Alternative was the Forest Services attempt to address issues and provide for the needs and wants of the public. After public comment the final Proposed Action Alternative was developed to further fine tune the original Proposed Action Alternative. A record of decision has been prepared for Proposed Action alternative in the Final Environmental Impact Statement. This record of decision is the proper place for the rationale regarding the decision. The rationale for the nonwilderness recommendation on the two wilderness study areas has also been included in the Proposed Action Alternative Summary of Change.

181-8

As mentioned in our response to your comment number 4, only approximately 3 percent of the existing undeveloped area would be developed in the first decade. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.

181-9

We agree that the nonquantifiable values of wilderness and wildlife are important but we disagree that they were not considered in the Plan. It is true that quantifiable recreation visitor days were used to track changes in the economic values of wilderness and wildlife but this does not mean that the nonquantifiable values were not considered. For example, in the modified Proposed Action Alternative, constraints were used to preclude timber activities in specific unroaded areas. This was done in recognition of the nonquantifiable values of these areas. Similarly, many of the considerations for wildlife addressed diversity of habitats and maintenance of viable non-game populations as well as the game populations that generate most of the recreation visitor days. Even though the nonquantifiable value considerations may not be as obvious as the quantifiable benefits, they were considered.

181-10

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 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.

Gila National Forest Plan comments, page 3

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. I further object to management activity D01 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.] 11

A careful reading of the DEIS reveals that Alternative F is superior in many ways to any other alternative considered in detail. The extreme timber production bias of this administration is the only explanation for selection of the preferred alternative, over Alternative F or some modest modification of it. For example, the following are superior benefits of Alternative F maximum NPV (p. 53), best improvement in habitat diversity and carrying capacity (p. 56), greatest improvement in riparian habitat (p. 58), Wilderness status for Wilderness Study areas, best protection of cultural resources, best water quality (p. 59, 112), less soil loss (p. 59), best natural distribution of habitats from a habitat capability standpoint (p. 99), the most wildlife recreation (p. 101), the same range improvement as other alternatives at less cost to both Forest Service and permittee (p. 104), the best level of construction and reconstruction of trails (p. 120), and the least fire hazard.] 12

I encourage you to further modify the preferred alternative by reducing the acreage devoted to timber production, reducing the amount of proposed roaded acreage, moving more towards accomplishment of many of the benefits to the land and other natural resources found in Alternative F, protecting important de facto wilderness areas mentioned above, and recommending the two WSAs for wilderness.

Sincerely,

Phyllenore D. Howard

Phyllenore D. Howard, Ph.D.

181-11

We agree that cattle use of campgrounds needs to be controlled. The standard and guideline you refer to 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."

181-12

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 some of 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 net public benefits than Alternative F.

LETTER 182

000182

3044 McDowell Road
Las Cruces, NM 88005

18 September 1985

Forest Supervisor
Gila National Forest
2620 North Silver Street
Silver City, NM 88060

Dear Forest Supervisor

Please do not let the Gila Forest go the way of so many of our forests--
a haven for lumberjacks and road builders. The Gila is a unique
wilderness area, and logging off the timber for the next fifty years
will certainly not merely alter its beauty but destroy the entire area,
its watershed, its wildlife, its very life.

We not only need to protect the Gila Wilderness as it now stands, we
need to see that more nearby areas are granted wilderness designation.
I support wilderness designation of the following areas:

- Lower San Francisco Canyon (6,700 acres)
- Hells Hole (18,860 acres)

In addition, I think that other areas should be managed as roadless
and undeveloped for semiprimitive, nonmotorized recreation. We must
protect these areas for their value for ecological study, recreation,
wildlife habitat, and watershed.

- areas along the Mogollon Rim, stretching from the Blue Range to the
Gila Wilderness (175,855 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)

Please do what you can to help those of us who are earnestly
interested in preserving the Gila Forest and surrounding areas. And
please let me know if there is anything more I can do to help preserve
these areas.

Thank you for your attention.

Sincerely,

Lynda Deming
Lynda Deming

GILA NATIONAL FOREST
SILVER CITY, NEW MEXICO

SEP 24 '85

DATE RECEIVED

FOREST SERVICE RESPONSE TO LETTER 182

182-1

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. Average production
from the Gila National Forest for the past 10 to 15 years has been 30 MMBF.
The existing allowable sale quantity is 54MMBF. 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% 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.

182-2

We have reevaluated our nonwilderness recommendation for the two wilderness
study areas and feel that the recommendation is still appropriate. The
rationale for the nonwilderness recommendation is included in the Proposed
Action Alternative Summary of Change located in the front of the public
comment document.

182-3

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% of the existing unroaded area on the Forest would be
developed during the life of the Plan. The development effects on specific
areas is displayed in the Proposed Action Alternative Summary of Change.

Box 63

Dixon, N.M. 88007

Sept. 19, 1985

000183

Forest Supervisor
Gila National Forest
2610 N. Silver St.
Silver City, N.M. 88061

GILA NATIONAL FOREST
SILVER CITY, N.M.

SEP 24 '85

Good day,

DATE RECEIVED

I am opposed to the preferred alternative
in the Gila NF Draft Plan.

A similar action has begun in my own
back yard - the Carson NF. The timber
harvest increase has caused much suf-
fering. The watershed is altered. Our
ditches overflowed, new acreages have
damaged land. The run off loses the
soil, which effects all the animals,
above, on, and under ground. The
land is raped. Financially it isn't
profitable.

But ethically it really stinks.
Our first wilderness needs to remain.
1,500 miles of new roads in the area
will never revert. The Blue Range is
sacked - I have hiked and fished in
the Gila for 12 years.

Please listen to the people,
Thank you

Sincerely,
Emmy Rios

183-1

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. The modified Proposed Action Alternative projects a timber harvest of approximately 30MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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. Classified Wildernesses, like the Gila, Aldo Leopold and Blue Range, will not be developed with roads or timber sales under any of the Plan alternatives. Please see the Proposed Action Alternative Summary of Change located in the front of the public comment document for a more complete description of the changes.

LETTER 184

FELLOW AMERICAN COLLEGE OF PHYSICIANS
FELLOW AMERICAN ACADEMY OF ALLERGY & IMMUNOLOGY
FELLOW AMERICAN COLLEGE OF CHEST PHYSICIANS

DIPLOMATE OF AMERICAN
BOARD OF INTERNAL MEDICINE
DIPLOMATE OF AMERICAN
BOARD OF ALLERGY &
IMMUNOLOGY

RICHARD W HONSINGER JR MD PA
LOS ALAMOS MEDICAL CENTER
LOS ALAMOS NEW MEXICO 87544

Telephone 662-4351

000184

September 11, 1985

Forestry Supervisor
Gila National Forest
2610 N Silver St
Silver City, NM 88061

Dear Sir

I support Wilderness designation for the lower San Francisco Canyon and Hell's Hole areas of the Gila National Forest. I oppose the opening of this area for logging. 1
2

I had the wonderful opportunity to spend 5 days in the Western Gila Wilderness and Gila National Forest this past May. It remains a lovely unspoiled area. With the current national interest in wilderness recreation, I expect that public utilization of such areas will continue to increase. I plan to go back again and I hope that you can help preserve these and similar areas such as the Frisco Box, Eagle Peak, and areas adjacent to the Aldo Leopold Wilderness area, as roadless and undeveloped areas.

Sincerely yours,


Richard W Honsinger, Jr, MD

CC Governor Toney Anaya
Rep Bill Richardson
Sen Pete Domenici
Sen Jeff Bingaman

FOREST SERVICE RESPONSE TO LETTER 184

184-1

We have reevaluated our nonwilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for the nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

184-2

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. The modified Proposed Action Alternative projects a timber harvest of approximately 30MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

LETTER 185

FOREST SERVICE RESPONSE TO LETTER 185

185-1

Sept. 19, 1985

000185

Forest Supervisor
Gila National Forest
Silver City, NM 88061

GILA NATIONAL FOREST
Silver City, NM, Mexico

SEP 23 '85

DATE RECEIVED

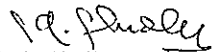
Gentlemen Re Proposed Gila National Forest Plan.

In studying the Gila Forest Plan and the Environmental Impact Statement I varied from many 'positives' to many 'uncertains'.

My early opinions were certainly in favor of the Proposed Action (PA). In fact I was rather content with this decision. As it became time to answer I re-read and re-studied. Reading a bit of bias into the PA I decided to examine it more carefully and compare with Alternatives B and I. In doing this I compared the various mathematical approximates in the tables. There seems to be less variance than I had anticipated. (Some of the math seems in error - totals vs breakdowns don't always tally.) Taking into consideration the future of the plan costs, income, and some benefits or losses (some w/out dollar amounts) was very interesting. To my amazement I find Alternative B intriguing. 'B' is reported as being devastating (my word) to the livestock industry. Also it is weak in production of timber and fuelwood. Yet, when one studies the summaries B stands up rather well in comparison. So well, in fact that I begin to wonder if planning for the future should be weighted in favor of livestock, timber, mineral, or is the future of the Gila better managed with more accent on the visual, habitat for wildlife, and recreation. Personally I love the Gila as a recreational area and commercial activity, both for me. Yet, to be a bit realistic, probably the Proposed Action Plan has more over-all advantages.

In summary, Plan F comes close to a surprise when Tables 3 and 4 - Costs versus Benefits - of the Alternatives are examined. Therefore I find I lean to a vote for Plan F, but admit to lacking enough real knowledge to believe that 'PA' could be faulty.

Thank You for the material and your time in reading this.


G. A. Hadley
Box 611 (El Cuit Hill area)
Puebloo Downs, NM 88346

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 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 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 net public benefits than Alternative F.



Wildlife Management Institute

Suite 725 1101 14th Street NW Washington D.C. 20005 • 202/371 1808

DANIELA POOLE
President
L. R. JAHN
Vice President
L. I. WILLIAMSON
Secretary
WESLEY M. DIXON Jr.
Board Chairman

000186

September 18, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, New Mexico 88061

Dear Sir

The Wildlife Management Institute is pleased to comment on PROPOSED GILA NATIONAL FOREST PLAN and DRAFT ENVIRONMENTAL IMPACT STATEMENT, New Mexico

The make-up of the plan and EIS causes problems for the reviewers. First, the management areas are all contiguous geographic units, each containing varied terrain, uses and resources. All other forest plans we have examined make their management areas into similar terrain, vegetation and uses, and often the area is scattered throughout the forest.

The system used by Gila National Forest makes it easy to visualize management on a small piece of the forest - but makes it almost impossible to evaluate what the forestwide effects will be for such things as wildlife, old growth, riparian systems or the other habitat components. That loss can be partially corrected by including some concise, complete tables of the forestwide totals and effects.

We believe that forestwide standards and guidelines are the most important part of a forest plan, especially for wildlife. Complete and unequivocal guidelines enable the public to track and monitor activities to see that they fit within the plan. The "Management prescription applicable to all areas except wilderness" is not complete with the information needed to monitor execution of the plan. The management area prescriptions do have much essential standards and guidelines information. However, it is scattered in 38 different geographical management areas covering 232 pages of fine-printed text. We can never be sure how riparian or winter range is to be treated by or on the Gila Forest, because each management area has a different "management emphasis" and the EIS discusses forestwide impacts in general terms.

The forestwide standards should be expanded to include minimum old growth to be left in commercial forest, winter range management, and riparian standards and management. Page 35 of the plan has cursory standards for slash piles and disturbance on calving grounds, etc. Much more information is needed.

It would be helpful to have a high wildlife alternative for comparison with the other alternatives. It would then be possible to recommend more specific improvements in the preferred alternative.

A complete summary table of the outputs and environmental effects by alternative should be included in the EIS.

The comprehensive plan goals of New Mexico Department of Game and Fish are mentioned. They should be presented and compared with the outputs the forest plan will produce.

186-1

Our management areas were defined as contiguous areas so that we could better address the issues on the Forest and so that we could effectively analyze Forest resources. We feel that this formulation provides the special data necessary to consider the variety of wildlife habitats needed to manage wildlife and other resources. When management areas are non-contiguous and scattered throughout the Forest, it is difficult to determine or manage for the acreages of the various habitats that are needed to sustain or increase populations within a species range. Total habitat acres may appear to be sufficient to meet wildlife goals but specially the habitats may not be blended in such a way as to be useful. By using contiguous management areas we feel we were able to effectively analyze the amounts of habitats and the special distribution so that wildlife response could be more accurately predicted.

186-2

We feel that the forest-wide effects information you are looking for is included in Chapter 4 of the EIS. The wildlife section of this chapter tells what will happen to the acres of habitat in each of the alternatives, how the habitat distribution will be effected and what the anticipated overall effects will be on wildlife. Riparian effects are also analyzed in this chapter.

186-3

We do not agree that the Forest-wide wildlife standards and guidelines are the most important wildlife management portion of the Plan. The Plan was divided into contiguous management areas so that wildlife could be emphasized in the portions of the Forest that were most optimal for wildlife management and so that the emphasis could be lower in other portions of the Forest. Habitat components are not treated exactly the same in every management area. As a result, it is not possible to include all wildlife prescriptions in the Forestwide Standards and Guidelines. Each management area includes standards and guidelines indicating the number of habitat component acres needed in the suitable and unsuitable timber portions of the management area and in the other portions of the management area. By including these standards and guidelines in the individual management areas, direction is established for the management of habitat acres and the distribution of habitats needed to meet the management objectives of each area.

Forestwide Standards and Guidelines for riparian habitat have been expanded in the Final Plan.

186-4

A Maximize Wildlife Benchmark is included in Appendix B. Alternative F is a relatively high wildlife alternative.

186-5

Table 9 in the Draft Environmental Impact Statement is a summary table of outputs. Most environmental effects could not be shown in table form so they were summarized in a narrative near the end of Chapter 2.

186-6

The New Mexico Department of Game and Fish is presently in the process of revising their comprehensive plan. We have the draft goals for selected big game species but the goals for fish and non-game are not available. We have addressed the accomplishment of these goals in qualitative terms in Chapter 4 of the EIS. Since their goal were not final before the Forest Plan was completed, we did not feel it was appropriate to quantify their goals in our planning documents. We have, however, addressed the accomplishment of their draft goals in our response to the New Mexico Department of Game and Fish letter. Please review our response to the New Mexico Department of Game and Fish comments on the plan.

175

LETTER 186

FOREST SERVICE RESPONSE TO LETTER 186

New Mexico Department of Game and Fish is mentioned in monitoring Will they furnish data? Be active participants? Or what?] 7

Livestock grazing is now out of balance Present use is 383,744 AUM, (EIS, page 102) The standards and guidelines provide "adjust permitted use to range capacity during the second decade " This means the present overgrazing will continue for 10 to 20 years We object to this management of lands that belong to all the people Use should be brought into balance in 3 to 5 years] 8

We prefer Alternative F, noncommodity emphasis, because of reduced timber, grazing, and increased wildlife, wilderness, old growth and wild and scenic rivers It is highly possible that much of the amenity improvement in Alternative F could be included in a revised preferred alternative] 9

Some specific comments follow

FOREST PLAN

Page 21, last paragraph Viable wildlife populations should not be a major management direction Wildlife management should aim for populations well above the viable level] 10

Page 22, Riparian A management direction to "improve all riparian areas to satisfactory condition" is not enough] 11

Page 34, 4th paragraph "Strive" to meet regional standards for riparian management is permission to not reach those standards Managers should be directed to meet the regional standards] 12

Page 49 It is confusing to move from forestwide standards to management areas with no differentiation in the form, not even a double line between the two] 13

Page 64, bottom of page, column "suitable timber area " This chart should indicate the total acres of suitable timber in the management area It is confusing to see that there are no habitat components left in the commercial timber area, and then find that is because there are no suitable timber lands at all] 14

186-7

We will use data furnished by the New Mexico Department of Game and Fish and we will invite them to participate in the monitoring process.

189-8

The standard and guideline that you reference has been changed to read "Permitted numbers will be balanced with capacity by the end of the second decade". We realize that this change does not meet your goal but it does provide for improvement in the situation in the first as well as the second decade.

We feel that the level of livestock grazing projected in the Proposed Action Alternative in 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 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.

186-8

Some of the amenity improvement in Alternative F have been added to the Proposed Action Alternative. Please see the Proposed Action Alternative Change Summary for a description of the changes. This summary is located in the front of the public response document.

186-10

We agree. The Proposed Action Alternative provides for wildlife populations substantially above the viable level. The word viable has been taken out of this goal.

186-11

This goal has been changed to read "Improve all riparian areas to satisfactory or better condition.

186-12

We agree. The regional standards have been added to the Forestwide Standard and Guidelines.

186-13

We agree. A double line has been added.

186-14

The total suitable timber acres is shown on a table one half page up from this table. We do not see a need to repeat the information in this table.

LETTER 186

Page 91, 1st paragraph Why the decline in wildlife AUM when the management emphasis is to increase livestock slightly and maintain current wildlife?] 5

EIS

Page 38, Issue Resolution, Alternative F Why cannot this intensive habitat coordination be included in the preferred alternative?] 6

Page 69 Tables 16 and 17 on key habitat and wildlife populations are good A table on New Mexico Department of Game and Fish goals should be included] 7

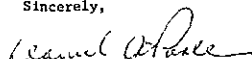
Page 98 8th paragraph "Coordination " This discussion of wildlife coordination should be included in forestwide standards and guidelines] 8

Page 98 How can Table 39, "Percent of change in existing habitat be related to Table 40 and 41 on effects of coordination and habitat? The numbers seem at odds with each other] 19

Page 101, Table 43 Are there numbers to go with these percentages of attainment of the state comprehensive plan goals?] 20

These remarks have been coordinated with William B Morse, the Institute's Western Representative

Sincerely,



Daniel A Poole
President

DAP slh

FOREST SERVICE RESPONSE TO LETTER 186

186-15

The change in wildlife AUMs indicated in the emphasis description were actually too small to measure. These type of small changes have been eliminated in the final Plan.

186-16

All alternatives contain a budget constraint. In Alternative F a significant portion of this budget was allocated to wildlife. This results in less budget dollars being available for other resource activities. If we did not have a budget constraint, the level of coordination included in Alternative F could have been included in the Proposed Action Alternative. With the budget constraint, however, budget dollars had to be allocated to provide for other resource management activities as well as wildlife. The result is that all of the activities proposed in the Plan could not be accomplished if wildlife coordination was included at the level in Alternative F. These are the types of tradeoffs that had to be considered in development of an alternative that balances resource uses and outputs within a constrained budget level.

186-17

We have included a discussion of the effects on the draft New Mexico Department of Game and Fish Comprehensive plan goals in Chapter 4 in the Final Environmental Statement.

186-18

The paragraph that you reference deals primarily with coordination of disturbance activities. The Plan already contains a standard and guideline that reads "Plan and administer disturbance activities in known elk calving, turkey nesting and raptor nesting areas so as not to disrupt caving and nesting success." We feel that this standard and guideline addresses the information that you referenced.

186-19

The acres of habitats are important but the distribution of habitats can be just as important. As indicated in the tables that you reference, the acres of habitat can actually be reduced and the quality of habitats can increase. This is because habitats are more ideally distributed and are made more available by increased wildlife improvements. More acres of habitat is not always of benefit if all of the needed habitat components are not available so that the habitats can be utilized. For example, large acreages of cover habitat may not be utilized if food and water is not near. Therefore, even though the numbers seem at odds, they are correct.

186-20

This table has been modified. In the Final Environmental Impact Statement a comparison of the alternative game species outputs to the New Mexico Department of Game and Fish's draft goals has been included.

LETTER 187

FOREST SERVICE RESPONSE TO LETTER 187

187-1

As a result of public comment, the timber harvest level has been re-analyzed. As a result of this re-analysis, the timber harvest has been reduced from 35 MMBF in the first decade to 30 MMBF. This harvest will remain at this level throughout time and is equal to the volume that has been sold from the Forest in the last 10 to 15 years.

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 monetary output. Thus, National Forests are managed for numerous products and amenities in addition to timber (forage production, water production, wildlife habitat, etc.). These additional benefits are derived, in part, through the process of harvesting timber. These benefits are hard to measure in economic terms, but they must be considered in measuring the effectiveness of the National Forest Management program. The effectiveness of the timber sale program cannot be totally evaluated by looking solely at the cost to prepare, sell, and administer the program in relation to the returns received from the sale of the timber. Unless the total range of the values produced from the sale process are considered, no meaningful conclusion can be reached.

187-2

Timber harvesting and road building do not necessarily result in excessive erosion and loss of riparian habitat. Sale contracts call for erosion control measures to prevent excessive erosion from skid trails, landings, and roads. The greatest soil loss occurs from areas in unsatisfactory watershed condition. Watershed condition and riparian condition will improve over time with the management projected in the Proposed Action Alternative.

187-3

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for the nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

187-4

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. The development effects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

000187

1011 W. Florence St.
Silver City, N.M. 88061
September 17, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, N.M. 88061

Dear Sir

We wish to comment on the Gila National Forest Draft Plan issued in June 1985

The proposed increases in timber harvesting and road building appear to be wholly unjustified and uneconomic. Over the last five years, the program has lost over 2 million dollars. Given the same conditions, it would seem that raising the timber harvest will only increase losses, which are paid for by taxpayers.

Adding insult to injury is the fact that our tax money actually would be supporting management practices damaging to the other important uses of national forests, especially watershed protection which in turn is vital to the limited riparian habitat. The latter is critical to much of our unique southwestern wildlife — a valuable resource in itself, both for recreational as well as scientific purposes.

We especially urge that certain remaining natural areas be kept roadless and added to the National Wilderness Preservation System, as the highest and best use of such forests.

LOWER SAN FRANCISCO CANYON, (6,700 acres) This canyon is a fine example of lower Sonoran riparian woodland containing an outstanding diversity of plant and animal life, including the endangered southwestern Bald Eagle. Off-road vehicle use will easily damage such a fragile landscape.

HELL'S HOLE, (18,860 acres) The rugged canyon, peaks and cliffs of the south and rolling hills in the north provide excellent opportunities for a variety of primitive recreation, and would seem to offer little economic return from other uses.

In addition we support management as roadless, undeveloped areas for semi-primitive non-motorized recreation, ecological study, wildlife habitat and watershed protection for the following

- 1) areas along the Mogollon Rim stretching from the Blue Range to the Gila Wilderness (125, 855 acres),
- 2) freestanding 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) which are a natural extension of this magnificent resource

Sincerely,

Dale A. Zimmerman
Dale A. Zimmerman, PhD.

Marian A. Zimmerman
Marian A. Zimmerman

LETTER 188

FOREST SERVICE RESPONSE TO LETTER 188



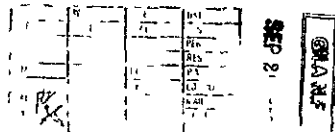
NATIONAL RADIO ASTRONOMY OBSERVATORY

POST OFFICE BOX 0 SODORRO NEW MEXICO 87801 0387
TELEPHONE 505 772 4011 TWX 510 J00 1/10

September 19, 1985

000188

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



Dear Mr Scoggin

In December 1980, Dr. A.R. Thompson, the Frequency Coordinator for the Very Large Array (VLA) of the National Radio Astronomy Observatory, wrote to Mr. Ronald L. Henderson in response to the request for comments on Forest Service activities related to the preparation of the Gila National Forest Plan. Dr. Thompson, commented on land usage for electronic equipment sites and on how this affects the Very Large Array. His comments included the reliance of radio astronomers on the shielding provided by mountain ranges to reduce interference from terrestrial transmitters and our serious concern that usage as electronic equipment sites of mountain peaks within, or close to, direct line of sight to the VLA be limited to the minimum of essential services with the radiated powers held to the minimum necessary levels.

On May 15, 1985 the National Science Foundation released funds to the National Radio Astronomy Observatory to begin construction of the Very Long Baseline Array (VLBA). The first VLBA antenna (one of ten distributed around the country) will be located near Pietown, New Mexico. Dr. Thompson's comments on behalf of the Very Large Array now also apply for the Very Long Baseline Array.

To avoid interference problems, our intention is to rely mainly upon coordination with other users, and your district offices have been cooperative in providing us copies of applications for transmitter sites. The number of cases of potential interference has been very small. Because of the past success of this process and because we anticipate that the Very Large Array and the Very Long Baseline Array will be a forefront scientific instrument for several decades, we have two major concerns regarding the Proposed Gila National Forest Plan and its Draft Environmental Impact Statement:

There is no formal recognition in either document of the need for coordination of new transmitter allocations and new electronic sites with the radio astronomical community and, in particular, with the Very Large Array.

There is no recognition of our concerns specifically with regard to those electronic sites with direct line of sight to the Very Large Array (e.g., the Mangus Mountain site) and to the new Very Long Baseline Array site at Pietown, New Mexico (the Mangus Mountain and Fox Mountain sites).

OPERATED BY ASSOCIATED UNIVERSITIES, INC.
UNDER CONTRACT WITH THE NATIONAL SCIENCE FOUNDATION

188-1

The Forest Plan has been revised to insure that coordination will occur between existing users and future proposals so that electronic interference will be kept within acceptable limits.

LETTER 188

FOREST SERVICE RESPONSE TO LETTER 188

Kenneth C. Scoggin

Page 2

September 19, 1985

We hope that the final Plan and Environmental Impact Statement will address our general concerns about minimizing radio interference at the Very Large Array and the Very Long Baseline Array and that a specific commitment will be made to coordinating with the National Radio Astronomy Observatory the development of the Mangus Mountain and Fox Mountain electronic sites

At a more mundane level, I found several inconsistencies between the electronic sites listed in the Draft Environmental Impact Statement (Table 28, page 85) and those identified on the map of the Transportation System and Utilities Corridors. Mr. Henderson and I concluded that both lists were incomplete and did include some errors.

2

For your information I am enclosing copies of two recent articles on the Very Large Array and the Very Long Baseline Array and a memorandum on their responses to interfering signals.

Sincerely yours,

Patrick C. Crane

Patrick C. Crane
Frequency Coordinator

PCC/bmg

Enc

cc R A Sramak
P J Napier

188-2

Appropriate changes have been made.

LETTER 189

000189

P. O. Box 134
Cloudcroft, New Mexico 88317
17 September 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Greetings-

I am writing to voice my opposition to the Forest Service "preferred alternative" plan to increase the timber harvesting and road building in the Gila National Forest. Timbering and road increases are uneconomic, damaging to forest uses and values, and destructive of the remaining wild country. I would rather you provide more protection of roadless lands, regarding this as the best and highest use of this forest] 1

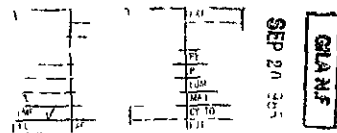
I support wilderness designation of the lower San Francisco Canyon and Hells Hole. The landscape in both areas is fragile, and off-road vehicle use can significantly damage it.] 2

Thank you for your time and attention.] 3

Best wishes,

Christy Stebbins
Christy Stebbins

cc: Senators Bingaman and Domenici
Congressman Skeen
Governor Toney Anaya



FOREST SERVICE RESPONSE TO LETTER 189

189-1

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. 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 the new roads constructed would be closed after timber activities are completed.

189-2

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 would be developed during the life of the Plan. The development effects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change located in front of the public comment document.

189-3

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is appropriate. The rationale for our nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change.

LETTER 190

FOREST SERVICE RESPONSE TO LETTER 190

000190

190-1

Thank you for your comment.

Arizona
Department of Commerce
Bruce Pabbitt Governor Beth S. Jannan Ph.D. Executive Director

MEMORANDUM

TO Forest Service
FROM Arizona State Clearinghouse
DATE September 13, 1985
RE SUMMARY OF THE DRAFT ENVIRONMENTAL IMPACT
STATEMENT FOR THE GILA NATIONAL FOREST
PROPOSED PALM
SAI NO AZ 85-80-0035

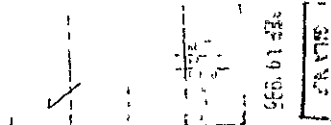
This memorandum is in response to the above project submitted to the Arizona State Clearinghouse for review

The project has been reviewed pursuant to the Executive Order 12372 by certain Arizona State officials and Regional Councils of Government.

The Standard Form 424 is attached along with any comments that were received for submission with the project. The comments are advisory

Attachments

cc Arizona State Clearinghouse
Applicant



State Capital Tower 1700 W. Washington Phoenix, Arizona 85007 (602) 295-5311

LETTER 190

FOREST SERVICE RESPONSE TO LETTER 190

SIGNOFF EXHIBIT A 67
OAS Approved No. 0349-0026

FEDERAL ASSISTANCE		2. APPLICANT'S APPLICATION IDENTIFIER	3. NUMBER 1950	4. DATE Year month day 19 10 1995	5. NUMBER 85-800035	6. DATE ASSIGNED Year month day 19 10 1995
1. TYPE OF SUBMISSION (Check appropriate box) <input type="checkbox"/> NOTICE OF INTENT (OPTIONAL) <input type="checkbox"/> PREAPPLICATION <input type="checkbox"/> APPLICATION		7. LEGAL APPLICANT/RECIPIENT a. APPLICANT NAME Forest Service b. ORGANIZATION UNIT Gila National Forest Land & Resources Mgt Plan c. STREET/P.O. BOX 2610 North Silver Street d. CITY Silver City e. STATE New Mexico f. CONTACT PERSON (Name & Telephone No.) N J Hassell, Regional Forester		8. EMPLOYER IDENTIFICATION NUMBER (EIN) 9. PRO-GRAM (From CFDA) 10. NUMBER 1 2 1 9 1 9 1 11. TITLE USDA FS		
12. PROPOSED FUNDING a. FEDERAL \$ 00 b. APPLICANT \$ 00 c. STATE \$ 00 d. LOCAL \$ 00 e. OTHER \$ 00 f. TOTAL \$ 00		13. CONGRESSIONAL DISTRICT'S OF a. APPLICANT b. PROJECT		14. TYPE OF APPLICATION a. FEDERAL b. STATE c. LOCAL d. OTHER e. OTHER (Specify) f. OTHER (Specify)		
15. PROJECT START DATE Year month day 19 10 1995		16. PROJECT DURATION Months 12		17. TYPE OF CHANGE (For 14 or 15) a. Amendment b. Extension c. Termination d. Other (Specify)		
18. DATE DUE TO FEDERAL AGENCY Year month day 19 10 1995		19. FEDERAL AGENCY TO RECEIVE REQUEST a. ORGANIZATIONAL UNIT OF APPROPRIATE b. ADMINISTRATIVE CONTACT (if known) c. ADDRESS Same as above		20. EXISTING FEDERAL GRANT IDENTIFICATION NUMBER 21. REMARKS ADDED Yes <input type="checkbox"/> No <input type="checkbox"/>		
22. CERTIFYING REPRESENTATIVE a. TYPED NAME AND TITLE b. SIGNATURE		23. YES, THIS NOTICE OF INTENT/PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12272 PROCESS FOR REVIEW ON DATE 24. NO, PROGRAM IS NOT COVERED BY E.O. 12272 OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		25. FEDERAL APPLICATION IDENTIFICATION NUMBER 26. FEDERAL GRANT IDENTIFICATION		
27. ACTION TAKEN a. AWARDED b. REJECTED c. RETURNED FOR AMENDMENT d. RETURNED FOR E.O. 12272 VIOLATION BY APPLICANT TO STATE e. DEFERRED f. WITHDRAWN		28. FUNDING a. FEDERAL \$ 00 b. APPLICANT \$ 00 c. STATE \$ 00 d. LOCAL \$ 00 e. OTHER \$ 00 f. TOTAL \$ 00		29. ACTION DATE Year month day 19 10 1995 30. STARTING DATE Year month day 19 10 1995 31. ENDING DATE Year month day 19 10 1995 32. REMARKS ADDED Yes <input type="checkbox"/> No <input type="checkbox"/>		

NSN 7540-01-006-8162 PREVIOUS EDITION IS NOT USABLE
STANDARD FORM 424 PAGE 1 (Rev. 6-84)
Prescribed by OMB C-11

STAY TO

Director
Agriculture & Horticulture Dept
421 Capitol Annex West
Phoenix AZ 85007

Indian Affairs
Game & Fish
Transportation
Ag & Hort
Parks
Region III

FROM Arizona State Clearinghouse
1700 West Washington Street Room 505
Phoenix Arizona 85007

This project is referred to you for review and comment. Please evaluate as to the following questions. After completion, return THIS FORM AND ONE XEROX COPY to the Clearinghouse no later than 17 WORKING DAYS from the date noted above. Please contact the Clearinghouse at 255 5004 if you need further information or additional time for review.

☐ No comment on this project ☐ Proposal is supported as written ☒ Comments as indicated below

- Is project consistent with your agency goals and objectives? ☐ Yes ☐ No ☐ Not Relative to this agency
- Does project contribute to statewide and/or areawide goals and objectives of which you are familiar? ☐ Yes ☐ No
- Is there overlap or duplication with other state agency or local responsibilities and for goals and objectives? ☐ Yes ☐ No
- Will project have an adverse effect on existing programs with your agency or within project impact area? ☐ Yes ☐ No
- Does project violate any rules or regulations of your agency? ☐ Yes ☐ No
- Does project adequately address the intended effects on target population? ☐ Yes ☐ No
- Is project in accord with existing applicable laws, rules or regulations with which you are familiar? ☐ Yes ☐ No

Additional Comments (Use back of sheet if necessary)

The proper management plan that allows multiple use but preserves wood production, better management habits are and provide better protection for wildlife and protect the environment is the goal of the forest service with the economic structure that allows the forest service to be self-sustaining and not rely on federal funds.

Reviewer's Signature *K. Heston*

Date *8-28-85*

Title *Director, Eastern Region*

Telephone *255-4373*

000191

Tom Klumker
L - H Ranch
Rt. 10 Box 183
Glenwood, N.M. 88039
September 16, 1985

Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City, N.M. 88061

Dear Mr. Scoggin,

After studying the Proposed Gila National Forest Plan and the Draft Environmental Impact Statement for the Gila National Forest Proposed Plan I am very disheartened and concerned about the overall lack of public and permittee participation in your plan.

I know of some permittees who have not received the information, and further more, know nothing of your proposed actions.

I received my plans and letter from you the latter part of May and it has taken me until now to realize the impact this proposed plan would have on the grazing of cattle on the Gila National Forest.

191-01

Public involvement 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 asking for the names of interested people was also published in 16 newspapers in the Gila area of influence. The 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 a definition of what an issue was, how we 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 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 to notify interested individuals about the draft Environmental Impact Statement and Proposed Plan. Approximately two months before the draft planning documents were ready to send to the public, we sent cards out to all the people on the mailing list telling them the planning documents would soon be available and asking them which documents they would like to receive. Those 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 and the draft Environmental Impact Statement in the Federal Register.

On May 31, 1985, Gila personnel sent planning documents to all individuals on the mailing list who requested copies of specific documents. Along with these documents, a letter was sent to all people who received the documents. They were informed that if they or the groups with which they were associated wished to meet to discuss the document, they could call to make arrangements.

At the same time the documents were mailed to people on the mailing list, 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 referenced above.

A second news release was sent to the same 24 newspapers and radio stations. This second news release notified the public of an extension of the public involvement period of 30 days. In this news release we also stated that we would arrange meetings with individuals or groups on 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 interested people and no additional notification was attempted by us.

Although on the surface the plan seemingly is for an overall slight reduction in AUM's over the long period, I have detected that many permits will be cut 30% in some management areas and even 60% in one management area.

This is going to have a severe impact on these ranchers, and your DEIS only poo - paha this grave move by saying "some impairment occurring in localized areas".

All through your documents you are seemingly cutting cattle AUM's because of so called wildlife conflicts, proposed reallocation of livestock forage to wildlife, fragile lands and current range condition.

Nowhere in your plan can you justify the severe cuts you are proposing in some management areas. Your decisions seem to be biased assumptions in AUM reductions, prior to actual allotment analysis.

Your plan seems to be totally based on administrative decisions rather than biological data which in the letter you sent me, states that "increases or decreases to specific allotments will be determined by standard allotment analysis procedures, not simply by implementation of the plan". This statement does not make sense when in many of the management areas you are proposing cuts of 30% to 100%. This tells me you have plans for eliminating specific allotments before you have completed any extensive monitoring range studies of these allotments. Yes I did say 100% because if you cut any allotment by 60% or even 30% you are effectively eliminating that rancher from running cattle on that allotment.

I think the permittees on the Gila National Forest need to have a more active part in your planning process, before you make the final plan. I am willing to bet that very few permittees on the Gila know of the proposed actions you are taking in their very livelihoods.

I have had your documents for almost 4 months and I have had a great deal of trouble deciphering and understanding what your proposed plan is.

I would think on something as important as this, that your office would be working with all of the permittees more closely and get your proposed plans out into the open and into simpler language and information that the lay person can understand.

I have great concerns also in regards to your assumptions on wildlife in your proposed plan. Your wildlife conflicts with livestock, proposed increase of up to 80% more wildlife, and wildlife values are evidently poorly studied and hope to see a better plan in this area.

191-02

It is difficult to generalize the economic impacts to each individual rancher of the Forest Plan because of the unique economic situation of each ranching operation. We recognize there is a potentially adverse impact to some permittees if the projections for future stocking rates occur. The economic hardship on the rancher is always considered; however, the paramount issue at hand is maintaining or improving the Forest resources and balancing permitted livestock use with capacity. There are several methods of accomplishing good stewardship and improved management to insure that use by livestock is conducted under the principles of sustained yield management 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 productively as we can which includes being good stewards.

191-03

Data used in the Plan to project stocking levels by management area was based on the existing allotment analysis data collected over the past 50 years. In situations where capacity is in question, some phase of the analysis may be conducted every year. In cases 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 used by the Forest Service to determine carrying capacity is reasonable and accurate.

The range resource is continually being impacted, and these impacts require the Forest Service to continually monitor and evaluate carrying capacity. Based on 50 years of observations, a data base was developed to address future output projections for the Forest Plan. The projections are only projections based on existing data; actual adjustments in livestock numbers will be determined using existing scientifically sound procedures to update this data. 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.

191-04

The Forest Plan is not the decision document that is used to adjust stocking on an individual allotment. It sets emphasis direction. Future adjustment, if necessary to comply with the management emphasis, will be determined through the Region 3 standard allotment analysis process. The analysis system is based on the biological capability of the land and associated impacts from grazing.

191-05

The responsibility of contacting impacted parties has been done, the opportunity to interact with the Forest Service, permittee groups, and the Grazing Advisory Board is there.

191-06

We share your desire for maintaining high levels of outputs for all resources and not making reductions in livestock numbers where a conflict with wildlife is unsupported. For this reason, we have added a statement to the Forestwide Standards and Guidelines stating "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 cancelled".

LETTER 191

I would like to see a complete analysis of the economic impacts to permittees resulting from your proposed AUM reductions, in your final plan. I am also concerned about your putting the blame on livestock as the major cause of soil eroding in the Gila National Forest. This is mostly conjecture on your part and I would like to see better handling of this important issue in your final plan.

Sincerely yours,
Tom Klunker
Tom Klunker

cc John Garland

FOREST SERVICE RESPONSE TO LETTER 191

191-7

Please refer to response number 2.

191-8

The wording in the DEIS suggesting soil loss from livestock grazing currently has the greatest impact on sediment yields is misleading. This is because livestock grazing takes place on more acres than other activities resulting in greater total loss. Timber harvest or road construction may have a greater impact on sediment yield per acre but the activity may involve 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.

LETTER 192

000192

Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, New Mexico 88061

6845 N. Firenze Drive
Tucson, Arizona 85704
16 September 1985

Re Gila Forest Draft
Management Plan.

Dear Sir

For years I have been interested in our national forests, and especially those in the southwest

On the basis of past experience increases in timber harvests promise increased costs to the taxpayer and are hardly "cost effective". Timber cutting and road building are also destructive of remaining wildlands and damaging to other forests and uses. As you know, watersheds in the Gila Forest are protective of irrigation, livestock and community needs. Hence I oppose timber cutting and road building in the Forest.

I also support wilderness designation as completely appropriate ecologically for Lower San Francisco Canyon and Hell's Hole.

FOREST SERVICE RESPONSE TO LETTER 192

192-1

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 firewood 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 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.

192-2

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. 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 the new roads constructed would be closed after timber activities are completed.

192-3

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for our nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change. This summary is located in front of the public comment document.

LETTER 192

Additionally, for non-motorized recreation, watershed protection and wildlife habitat it would seem advantageous to the growing, future population of the southwest that the following areas be managed as undeveloped, namely

- 1) Areas adjacent to Aldo Leopold Wilderness
- 2) Freestanding wilderness potential areas like Frisco Box and Eagle Peak.
- 3) Areas along the Hogollon Rim which range from the Blue Range to the Gila Wilderness

Yours sincerely,

Ernest H. Tilford
Ernest H Tilford

FOREST SERVICE RESPONSE TO LETTER 192

192-4

Of the approximately 688,000 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. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 193

A. LANE LECKMAN, M.D.
Psychiatry
Addictive Disorders

000193

11000 Candelaria N.E. Suite 110W
 Albuquerque New Mexico 87112

293-5782

September 10, 1985

Forest Supervisor
 Gila National Forest
 2610 North Silver Street
 Silver City, New Mexico 88061

Dear Sir

I oppose the increases in timber harvests and road construction. I also oppose putting new roads into remaining natural areas. It is my understanding that such activity will be uneconomic, that it will certainly damage other uses of the forest.

1
 2

I have hiked, camped, fished and explored the Gila since I was a Boy Scout in the 1950's. I value this forest, and I strongly support maintaining it as close to its natural state as is reasonable.

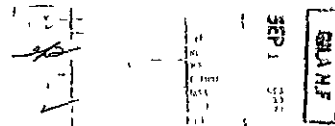
I also support wilderness designation for the lower San Francisco Canyon and Hell's Hole.

3

Thank you for your attention to this

Sincerely,

AL
 A. Lane Leckman, M.D.



FOREST SERVICE RESPONSE TO LETTER 193

193-1

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. 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 the new roads constructed would be closed after timber activities are completed.

193-2

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 would be developed during the life of the Plan. A display of the development effects on individual unroaded areas can be found in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

193-3

We have reevaluated our nonwilderness recommendation for the two wilderness study areas and feel that the recommendation is appropriate. The rationale for the nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change.

LETTER 194

FOREST SERVICE RESPONSE TO LETTER 194

000194

September 16, 1985

Forest Supervisor
Gila National Forest
2610 N Silver Street
Silver City, NM 88061

Dear Forest Supervisor

As a member of the Wilderness Society, I support that organization's opposition to increases in timber harvesting and road construction in the Gila National Forest. Key remaining natural areas must be kept roadless.

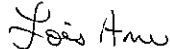
Timbering and road increases are uneconomic, damaging to other forest uses and values, and destructive of remaining wildlands.] 1

Furthermore, I support wilderness designation for the Lower San Francisco Canyon and Hells Hole.] 2

Please manage as roadless and undeveloped areas along the Mogollon Rim from the Blue Range to the Gila Wilderness, Frisco Box, Eagle Peak and other such freestanding wilderness candidate areas and also areas adjacent to Aldo Leopold Wilderness.] 3

Thank you for adopting a conservationist stance.

Sincerely,



Lois Ario
5400 Montgomery NE #709B
Albuquerque, NM 87109

cc Governor Toney Anaya
State Capitol
Santa Fe, NM 87503

194-1

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. 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 the new roads constructed would be closed after timber activities are completed.

194-2

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for our nonwilderness recommendation is included in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

194-3

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. The development effects on specific unroaded areas are displayed in the Proposed Action Alternative Summary of Change.

LETTER 195

FOREST SERVICE RESPONSE TO LETTER 195

DAVID B. PITTARD
333 EAST MAIN STREET
FARMINGTON NH 07401

000195

GILA NATIONAL FOREST
Silver City, New Mexico

SEP 18 '85

DATE RECEIVED

September 16, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Re Draft Management Plan for Gila National Forest

Dear Sir

I am aware of the "preferred alternative" by the Forest Service contained in the Draft Management Plan for Gila National Forest. I believe that to the extent it is concerned with increasing timber harvest that this alternative proposal is uneconomic to the taxpayers due to the losses sustained by the timber sale program over the last five years. The increase in timber harvesting will also undoubtedly result in erosion of fragile areas which will significantly reduce the multiple uses which can now be made of this area.

1
2

195-1

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. 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 the new roads constructed would be closed after timber activities are completed.

It is important to point out that even with these changes some individual timber sales may not have monetary benefits that are higher than costs. 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 firewood 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 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.

195-2

Some additional soil loss will occur as a result of timber activities but through mitigation measures and timber contract specifications soil loss is minimized. Soil loss will not occur at a rate that will decrease the productivity of individual areas.

I am especially disturbed at the increase in off road vehicles which would be allowed by this proposal]3

Such proposals which call for the public to make comment are usually not sufficiently brought to the attention of the public, and thus I hope you will give this letter more consideration than to simply count it as one man's opinion. The preservation of such areas of the Gila Wilderness is extremely significant, well out of proportion to the number of people who make use of these areas in any given time. It is a little like destroying the moon. Very few people have been there, but it remains very important to everyone, though not in an economic sense. Fortunately, there remains at this time significant wilderness resources available for the ordinary citizen to use in their primitive state. The existence and preservation of such areas requires that access be also by primitive means, for example, by horse or backpacking. Those who endeavor to use such primitive places are the least destructive of them. Litterbugs are rarely up to the effort of visiting such places.]4

The Gila Wilderness may also be considered a natural work of art. Timber harvesting, up to a point, may be useful in the act of preserving the Gila Wilderness, but it must be kept in mind that the primary significance of this area is not to function as an economic base but as a psychological resource. Anything which diminishes the public's use of the Gila Wilderness as a wilderness is unfortunate. The natural pressures of our civilization tend to destroy wilderness areas much as the buffalo were destroyed as a significant animal population. Help preserve the Gila Wilderness.

Sincerely,


DAVID PITTARD

195-3

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 produce resource damage. Historically the Forest has not been heavily used for ORV recreation. Significant resource damage has generally not occurred. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

195-4

The Gila Wilderness and all other designated wildernesses on the Forest will be preserved in their natural condition. Wilderness areas are designated by the 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. No management activities are planned in any of the alternatives that do not comply with the Wilderness Act. All projected timber and road building activities are outside classified wilderness.

LETTER 196

000196

Box 400
Shiprock, NM 87420

Forest Supervisor, Gila National Forest
Silver City, New Mexico

Dear Sir

As a person who hikes and backpacks in the national forests out of necessity, necessity to re-create myself regularly out of the stresses of my nursing job, I am writing to protest the Gila National Forest Draft Plan. Rather than a multiple-use plan, it is a one-sided plan, allowing exceptional timber harvests which will result in more road building and in deforesting and destroying portions of the watershed. Destruction of the watershed will destroy some of the riparian environment which is necessary to the relaxing and refreshing qualities of the Gila. Strangely enough, figures which I have seen indicate the government is losing money on the timber sales in the Gila. I certainly do not wish my tax dollars used in deforestation. A good multiple-use plan would protect the wide diversity of flora and fauna to maintain the recreational aspects of the national forests. Trees can be replanted and harvested for generations, but an ecosystem once destroyed may never be restored.

1
2
3

FOREST SERVICE RESPONSE TO LETTER 196

196-1

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. 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 the new roads constructed would be closed after timber activities are completed.

196-2

Timber harvesting and road building do not necessarily result in excessive erosion and loss of riparian habitat. Sale contracts call for erosion control measures to prevent excessive erosion from skid trails, landings, and roads. The greatest soil loss occurs from areas in unsatisfactory watershed condition. Because of management activities prescribed in the Plan watershed condition and riparian condition will increase over time.

Since areas that harvested for timber are regenerated, the deforestation that you mention will not occur.

196-3

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 firewood 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 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 196

While I enjoy hiking along 4-wheel-drive roads, I also need the quiet and solitude of the wilderness. The 6700 acres of the Lower San Francisco Canyon and 18,860 acres of Hells Hole should be given Wilderness status. Other areas of the Gila which should be preserved in a roadless state, preserved for ecological study, recreation, wildlife habitat, and watershed protection are 125,855 acres of the Mogollon Rim from the Blue Range to the Gila, 40,050 acres of the Frisco Box, 30,380 acres around Eagle Peak, and 170,160 acres adjacent to the Aldo Leopold Wilderness.

Sincerely,

Sylvia Lee

9/16/85

GILA NATIONAL FOREST
Silver City New Mexico

SEP 18 '85

DATE RECEIVED

FOREST SERVICE RESPONSE TO LETTER 196

196-4

We reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

196-5

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. The effects on specific areas is displayed in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

LETTER 197

FOREST SERVICE RESPONSE TO LETTER 197

197-1

1112 Calle Catalina
Santa Fe, New Mexico 87501
17 September 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000197

U.S. NATIONAL FOREST
SANTA FE, NEW MEXICO

SEP 18 '85

Dear Sir: Draft Management Plan
Gila National Forest

DATE RECEIVED

I am writing to express my concern over the increased timbering and road building proposed in the preferred alternative for the Gila National Forest.

If past experience is a guide, the timber sale program must be expected to lose money, and I object as a tax payer as well as an environmentalist.

The construction of new roads into areas of potential wilderness value is a regrettable trend in all national forests. It would be particularly unfortunate in the Gila National Forest, because it would destroy the integrity of one of the nation's most important remaining wildlands. In the Gila, the economic incentives for such destruction are relatively insignificant.

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. 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 the new roads constructed would be closed after timber activities are completed.

197-2

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 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 firewood 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 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.

197-3

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. The effects on specific areas is displayed in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

LETTER 197

Instead of increased timbering and road building, I would like to see more of the Gila National Forest included in the National Wilderness Preservation System, specifically the Lower San Francisco Canyon and Hells Hole areas]4

The Gila National Forest is one of the outstanding treasures of America's heritage, and I shall be thankful for everything you will do to preserve it

Sincerely,

Carl F J Overhage
Carl F J Overhage

cc- Hon. Pete Domenici, U S. Senate
Hon. Jeff Bingaman, U S Senate
Hon. Bill Richardson, U S House of Representatives
Governor Tony Anaya, New Mexico State Capitol

FOREST SERVICE RESPONSE TO LETTER 197

197-4

We reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

LETTER 198

FOREST SERVICE RESPONSE TO LETTER 198

MARC BERNAT
SUITE 1424 FIRST CITY NATIONAL BANK BUILDING
EL PASO TEXAS 79901

000198

POTASH BERNAT SIFES & BERNAT P C
ATTORNEYS AND COUNSELLORS
(915) 532-1491

September 10, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

U.S. NATIONAL FOREST
SILVER CITY, N.M.

SEP 18 '85

TO WHOM IT MAY CONCERN

DEAR MR. [REDACTED]

This letter is in response to the draft Management Plan for the Gila National Forest issued by the U.S. Forest Service. I am not a member of the Sierra Club or any similar organization, but I am independently and extremely concerned over the proposed plan.

My family and I have spent numerous vacations in and around this National Forest, and we have grown to appreciate what it has to offer for us and others. We believe that increasing the timber harvest and grading roads in and about the forest would constitute the first major step in the urbanization of the Gila National Forest. Roads inevitably lead to overuse by our mobile society. The harvesting of timber always results in a disregard of the wilderness concept and increased erosion.

It seems to be that the decision was made long ago to preserve the "wildness" of this wilderness, and the proposed plan will permit a severe intrusion on this wildness. People need the opportunity to experience the wildness offered by the Gila National Forest, and any intrusion will substantially reduce this opportunity.

The Gila National Forest serves a vast area in the Southwest--without it, those of us in El Paso will not have opportunity whatsoever to visit a wilderness park without traveling many, many miles. For us, the Gila is not only the closest wilderness park, but also the only wilderness park within reach.

Please take our thoughts and concerns into consideration. Thank you.

Sincerely,

[Signature]
Marc Bernat

df

198-1

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. 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 the new roads constructed would be closed after timber activities are completed.

It is important to note that no road building or timber activities will be conducted in the classified wildernesses on the Forest. As you stated, this decision was made long ago. It would take an act of Congress before development activities would take place in the Wildernesses. No nonwilderness activities have been planned in any wilderness area under any of the alternatives.

against US air carriers until more shown that American said a mediation, he said to the way, I will I am not
Washington lifts its threat credibility is null and void Reagan and tell him that we cate the call one of several man spoke Lebar
against Lebanon A telephone call to a Western held a lot of respect for Presi made from time-to-time to Arabic

WILDERNESS: BLM philosophy 'outdated'

Continued from page 1

It ordered BLM to inventory 174 million acres to see whether they met requirements of the Wilderness Act, substantially free from the imprint of man's work and offering outstanding opportunities for solitude or a primitive and unconfined type of recreation.

In 1980 BLM concluded that 24.8 million acres met those requirements. Since then BLM has been weighing those wilderness values against competing uses such as mining, intensive grazing and developed recreation such as ski resorts. In designated wilderness, roads and motorized vehicles are banned, as is mining except for pre-1976 claims. Grazing is allowed if it does not erode wilderness qualities. Campsites are primitive.

Critics such as Kincaid say BLM under the Carter administration wrongfully dropped many qualified areas from study. But President Reagan's first interior secretary hammered into BLM a "anti-wilderness bias," says a New Mexico BLM employee who feared dismissal if identified.

That bias was profound and intense and blatant and overt, the employee says.

Lawson denies such a bias. He says "selecting wilderness is paramount during the study and qualified areas generally are being recommended for protection."

Critics see a different record. They note so-called "Watt droppings" — his order removing more than 15 million pristine acres from study. Environmental groups sued Watt and recently won in federal court.

They also point to BLM's emerging record of how it would manage the 320



ROBERT BURFORD
Director of BLM

study areas. Of the 18.8 million acres where preliminary decisions have been made, 7.2 million — 38 percent — are considered suitable for wilderness. For most areas, BLM believes other uses such as mining or intensive cattle grazing are more important.

BLM decisions will be filtered through the Interior secretary and by 1991 reach the president who will make recommendations to a Congress where there is already doubt that vast areas in Utah, Idaho, Oregon and Wyoming weren't studied.

Seen from the air, the earth is a skeleton

is exposed in southern Utah. Sparse vegetation fails to cover eons-old shifts of the earth. Sandstone spires and fins protrude rib-like, rising hundreds of feet. Massive canyons reach back miles from rivers like the Colorado and Green. Mount Ellen's neighbors are Canyonlands and Arches national parks and the Henry Mountains, with the nation's last free-roaming buffalo herd.

The high plateau rangeland below Mount Ellen drops away to badlands — a grayish blue labyrinth of canyons and side canyons. It is a tortured wasteland, virtually void of plant or animal, that ill fits the popular wilderness concept of lush forests and spectacular mountains.

If lacking traditional beauty, these lands have traditional value. Oil and minerals companies have filed thousands of claims in the area — claims that federal law ordered BLM not to consider when deciding what areas to study.

But Clive Kincaid, now aligned with environmental groups, spent months scouring BLM records and found that in 60 or 70 situations in southern Utah the boundaries of wilderness study areas end where mineral claims begin.

Asked about Kincaid's charge, Thom Slater, planning and environmental coordinator for BLM in Utah, says "That's basically what we did."

If an area had activity, we just decided to leave it alone," Slater says. "We don't believe we have abused the rules."

We felt we had the best part (wilderness) inside and the worst outside.

Officially, Utah BLM insisted that excluded areas failed to meet requirements for naturalness or solitude.

Believing areas were excluded to avoid conflicts with powerful energy interests, Kincaid and the Utah Wilder-

ness Association appealed the Mountain boundaries to the Interior Board of Land Appeals. In April, BLM overruled the agency.

Though usually supporting "discretion" in identifying study areas, BLM has agreed with several environmental appeals from Utah. One total of 584,100 acres reconsidered has not answered the charge that dropped areas because of mining or other conflicts. On that issue, BLM and others are weighing a lawsuit.

It is not surprising that Utah BLM tangled with BLM. Janet Hoss, an outdoor guide from Monticello, was on a three-member team in 1979 was given one day to judge wild values of 120,000-acre Manasco. Management reversed the team's report for wilderness without explanation, BLM rules.

Such blatant abuse suggests the 1976 BLM had no mandate to serve changing employees' dedication to mining and cattle hard.

Sometimes the judgment is flat. The Owyhee River Basin of south Idaho BLM first said 394,635 acres should be studied. After ranchers' objections, the study was cut to 237,849 acres.

And residents of Ajo, a copper town in southern Arizona, objected to studying the 13,000-acre Chuapo area of volcanic spires and organ pipe cactus. Their campsite congressman agreed, and BLM of caved in. The congressman, Don Morris Udall, darling of environmentalists.

MONDAY How grazing, mining wilderness



FROM THE DESK OF STANLEY SPRECHER

9/9/1985

000199

1935 Chilton Dr

Las Cruces, N M 88001

Is it all cut and dried??

That is the question of which
roads are set up (at tax payers
expense) so some harvestable timber
can be taken out ??

Please give the other tax
payers a 2nd thought when we
beg KEEP THE GILA ROAD FREE

--to the present extent

at 1 st

Sincerely,

GILA NATIONAL
FOREST

SEP 11 1985

Stan Sprecher

199-1

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. 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. Ninety-seven percent of unroaded areas on the Forest would remain unroaded for the first 10 years. The areas that remain unroaded when the Plan is revised in 10 to 15 years would be reevaluated for possible wilderness classification.

LETTER 200

FOREST SERVICE RESPONSE TO LETTER 200

200-1

P O Box 52
Pinos Altos, NM 88053

September 14, 1985

Mr Ken Scoggin, Forest Supervisor
Gila National Forest
2610 N Silver St
Silver City, NM 88061

Dear Mr Scoggin

In response to the May 1985 Gila National Forest Draft Plan, I would like to communicate my opposition to proposals to increase timber harvests and road construction in the Gila National Forest. I feel that these activities would have a destructive influence on the remaining wildlands therein, would ultimately be detrimental to more primary forest uses and values, and are basically economically unsound.

As one of the last large unprotected wilderness areas in the Southwest, roading and timbering in the Gila National Forest would eliminate many natural areas therein from consideration as 'wilderness'. The stated preferred alternative of the Draft Plan would also allow damaging off road vehicle use in sensitive roadless areas.

These roading and timbering activities would allow the removal of vegetation cover in steep terrain which is difficult, at best, to reforest and greatly increase soil washout into rivers and streams, damaging riparian habitat and degrading the quality of the region's water supply.

000200

GILA NATIONAL FOREST
SILVER CITY, NM

SEP 17 1985

DATE RECEIVED

Because of the reductions in timber volumes in the modified Proposed Action Alternative and because of changes in the timber sale locations, the Proposed Action Alternative development effects on unroaded areas have been reduced. [See the Proposed Action Alternative Summary of Changes located in front of the public comment document.] 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan.

200-2

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 produce resource damage. Historically, ORV use on the Forest has not been heavy and has generally not resulted in significant resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

200-3

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 and riparian habitat, degradation of the region's water supply, and that steep slope logging areas would be difficult to regenerate. 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 habitat diversity and carrying capacity 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. Riparian habitats would also be improved over time.

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 degrade that supply.

The National Forest Management Act guidelines for defining suitable timber provides for the elimination of timber areas where regeneration cannot reasonably be assured within 5 years after final removal. As a result, all areas where regeneration problems were anticipated have already been eliminated from the suitable timber base. Regeneration should not be a problem on the steep slope areas where logging is proposed.

LETTER 200

Figures from the past five years indicate that the Gila's timber sale program has lost over 2.5 million dollars (23¢ for each dollar spent to produce and sell the forest's timber). These losses will increase if the plan's preferred alternative is adopted.] 4

I strongly support and urge the protection of roadless, unforested lands as the best and highest use of the Gila National Forest, and specifically support wilderness designations for the Lower San Francisco Canyon and Hells Hole, south of the San Francisco lower drainage. Additionally, I would like to see the following areas managed as roadless and undeveloped for semi-primitive, non-motorized recreation: the Mogollon Rim stretching from the Blue Range to the Gila Wilderness, any freestanding wilderness candidate areas such as the Frisco Box and Eagle Peak, and areas adjacent to the Aldo Leopold Wilderness. Thus protection would help to retain the value of these lands for ecological study, recreation, vital wildlife habitat and sensible watershed protection. Such, again, I feel is the best and highest use of the forest.] 5
] 6

Thank you.

Sincerely,

Eyle A. Jones
Eyle A. Jones

cc New Mexico Governor Tony Anaya, U S Senators Jeff Bingaman and Pete Domenici, U S Representatives Bill Richardson, Manuel Lujan and Joe Skeen, Jim Norton, The Wilderness Society, and Jim Owen, Coordinator, Sierra Club

FOREST SERVICE RESPONSE TO LETTER 200

200-4

It is not correct to single out individual costs called timber costs, recreation costs, etc., and assign single benefits to those costs. Few 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 wildlife habitat diversity is maintained or increased. The timber harvest activities open up some stands. Additional wildlife forage becomes available in these areas. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this, even though some of the benefits are to wildlife, 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.

200-5

We have reevaluated our nonwilderness recommendation on the two wilderness study areas and feel that the nonwilderness recommendation is appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

200-6

As mentioned above, the development effects on unroaded areas has been reduced in the modified Proposed Action Alternative. The effects on specific unroaded areas is displayed in the Proposed Action Summary of Change.

LETTER 201

FOREST SERVICE RESPONSE TO LETTER 201

201-1

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. 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 the new roads constructed would be closed after timber activities are completed. For a more complete description of the changes in the Proposed Action Alternative, see the Proposed Action Alternative Summary of Change located in the front of the public comment document.

201-2

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for our non-wilderness recommendation is included in the Proposed Action Alternative Summary of Change.

4

201

Sept 15, 1985

000201

Dear Sir

I am very concerned about your recent draft management plan for the Gila National Forest issued in June 1985. My understanding is that you are requesting/proposing an increase in road building which will increase timber harvesting. As one who has been fortunate to have hiked in the Gila I am opposed to your proposal. In my opinion road building + logging will be destructive to the Gila's slopes and destruction. In fact I feel we need additional wilderness in Lower San Francisco Canyon and Hells Hole Area.

To: Forest Supervisor
Gila National Forest

000202

GILA NATIONAL FOREST
Sep 17 1975

From: James V. Lewis

SEP 17 1975

Subject: Draft Management Plan
for Gila Nat. Forest.

DATE REPLY

I oppose the increases in
timber harvesting and road building
of the preferred alternative as

1. Uneconomic. Losses would be
at least 25% of the cost 1500
miles of new roads would be
needed.
2. Damaging to other multiple uses.
The Gila is largely steep, easily
eroded terrain in which it is difficult
to reforest. With removal of the
vegetative cover, soil is washed
down into the streams damaging
the wildlife habitat and quality
of the regional water supply for
irrigation, livestock and community
needs. Allowed off the road
vehicle use would damage
roadless areas.

I support wilderness designa-
tion for the following areas
Lower San Juan River Canyon
(6,700 acres) a superb example
of lower Sonoran riparian wood-
land. The diversity of plant and animal
life is remarkable. The mature
riparian vegetation would be damaged

202-1

As a result of public comment, the timber harvest data projections were
reanalyzed. As a result of this reanalysis, the timber harvest has been
reduced from 35 MMBF in the first decade to 30 MMBF. This harvest will
remain at this level throughout time.

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 monetary output.
Thus, National Forests are managed for numerous products and amenities in
addition to timber (forage production, water production, wildlife habitat,
etc.). These additional benefits are derived, at least in part, through the
process of harvesting timber. These benefits are hard to measure in
economic terms, but they must be considered in measuring the effectiveness
of the National Forest Management program. The effectiveness of the timber
sale program cannot be totally evaluated by looking solely at the cost to
prepare, sell, and administer the program in relation to the returns
received from the sale of the timber. Unless the total range of the values
produced from the process are considered, no meaningful conclusion can be
reached.

202-2

As a result of public response, the Plan has been changed to hold timber
harvest activities at the current level [30 MMBF per year]. This will
result in a reduced cable logging program and a reduction in the need for
road construction. Road construction or timber harvest is prohibited within
designated wilderness areas. Cable logging on steep slopes cause less soil
disturbance than conventional harvest methods. Harvest practices will
maintain sufficient trees to provide growing stock for the future and
prevent extensive soil loss from the site.

202-3

ORV use is recognized as a form of recreational experience. ORV use of the
Forest has been relatively light and has generally not resulted in excessive
resource damage. The Plan addresses this issue by permitting such use to
as long as it does not produce resource damage. In the event this
use begins to cause resource damage, the affected area will be
closed to ORV use.

by off road vehicle use.

Hells Hole (18,860 acres) has deep rugged canyons, rocky peaks, steep cliffs and rolling hills. This is excellent for primitive recreation.

I request that you manage the following areas as roadless and undeveloped for primitive, non-motorized recreation to retain their value for ecological study, recreation, wildlife habitat and watershed protection.

Area along Mogollon Rim from Blue Spring to Hells Hole (125,855 acres)

Two outstanding wilderness candidate areas such as Frisco Box (40,050 acres) and Eagle Park (30,380 acres)

Area adjacent to Aldo Leopold Wilderness (170,160 acres). These are a natural extension of the Aldo Leopold Wilderness.

James V. Lewis

JAMES V. LEWIS
3410 MARK ROAD, N.E.
ALBUQUERQUE NM 87107

Copies: Rep. Tujan, Senator Bingaman,
Senator Donahoe, Governor
Anaya.

202-4

We have re-evaluated our non-wilderness recommendation between the draft and final and still feel that the area should be recommended for non-wilderness. Our rationale for the non-wilderness recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

202-5

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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

203

Forest Supervisor
 Gila National Forest
 2610 N. Silver St
 Silver City, N. Mex 88061
 Mr. Gila N'F Draft Plan 1985

6228 Constellation Dr
 EL PASO, TEX 79912
 14 Sept 1985

000203
 GILA NATIONAL FOREST
 SILVER CITY, N. MEXICO
 SEP 17 '85

Gentlemen,

The Gila is Centrally located to an area of 3 million people. As such, recreation, wilderness and preservation values should be emphasized.

Timber harvesting, grazing and road building should be at a lower priority.

I, and my family, have been "users" of the Gila since 1955 and we find that the "multiple use" concept has generally led to "multiple abuse".

Thank you

Respectfully,
 John T. Bowen

P.S. And no dams, please!

Several changes have been made to the Proposed Action Alternative in response to your comment and comments expressing similar concerns. 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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

We feel that these changes will result in balanced use of the Forest's resources.

You also referenced the Connor dam in your comment. 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.

HARDIE, HALLMARK, SERGENT & HARDIE

000204

A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
THIRD FLOORBRUCE HALLMARK
BOARD CERTIFIED BY TEXAS BOARD
OF LEGAL SPECIALISTS IN
TAX LAW
ESTATE PLANNING & PROBATETEXAS NATIONAL BANK BUILDING
EL PASO TEXAS 79901-1335AREA CODE 915
TELEPHONE 544-5222
MAILING ADDRESS
173 N. KANSAS STREET
EL PASO TEXAS 79901-1335

September 16, 1985

AS RECEIVED
MEXICO

7'85

DATE RECEIVED

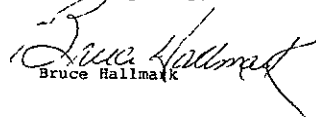
Forest Supervisor
Gila National Forest
2610 N Silver Street
Silver City, New Mexico 88061Re Public Comments On U S Forest Service Draft Management
Plan For The Gila National Forest

Dear Sir

By this letter I want to register strong opposition to the Draft Management Plan which was filed in June, 1985. Specifically, there must be no increases in timber harvests, and the roadless areas must be kept in their natural state. It would be a crime against all future generations if we tear up what little natural remaining land we have left. I am astounded that the Forest Service, of all institutions, would not understand the urgency of this.

Instead of raping and pillaging the forests, you should be designating additional areas for wilderness preservation. Particularly, the lower San Francisco Canyon and the Helli's Hole area should be designated for inclusion in the National Wilderness Preservation system. By copies of this letter to Senators, Congressman, and the New Mexico Governor, I am urging them to stop the madness of destroying these public lands.

Yours very truly,


Bruce Hallmark

BH/kem

204-1

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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This is equivalent to the amount of timber sold from the Forest in the last 10 to 15 years. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

204-2

We re-evaluated our non-wilderness recommendation on the wilderness study areas and feel that the recommendation is appropriate. The rationale for the non-wilderness recommendation is included in the Proposed Action Alternative Summary of Change.

west's wildlife and degrading the quality of the region's water supply. The Gila's rich cultural resources would also be exposed to harmful activities, and opportunities for primitive recreation would be lost under the draft plan.

• **destructive of remaining wildlands** Some of the last large unprotected wilderness in the Southwest is on the Gila National Forest. Roading and timbering will eliminate many of these areas from consideration as wilderness. The "preferred alternative" also allows damaging off road vehicle use in sensitive roadless areas.

A CONSERVATIONIST ALTERNATIVE

Tell the Gila forest supervisor that you oppose the increases in timber harvests and road construction and that key remaining natural areas must be kept roadless. The timbering and road increases are 1) uneconomic, 2) damaging to other forest uses and values, and 3) destructive of remaining wildlands. The Forest Service needs to know you support protection of roadless lands as the best and highest use of the forest.

You can help protect more of the Gila. Of the two areas on the forest considered for possible inclusion in the National Wilderness Preservation System, the plan recommends both for non-wilderness use. Tell the Gila forest supervisor you support wilderness designation for the following areas:

• **Lower San Francisco Canyon** - (6,700 acres) Located near the New Mexico-Arizona border near Glenwood, New Mexico, the canyon is a magnificent example of lower Sonoran riparian woodland. A remarkable diversity of plant and animal life is found here, including endangered species such as the bald eagle. Groves of mature riparian vegetation grow on the benches of the outer valley floor. This landscape is fragile and off road vehicle use will intensify the impact of occasional flooding.

• **Hells Hole** - (18,860 acres) Just south of the Lower San Francisco, this area retains its overall natural appearance. Characterized by deep rugged canyons, rocky peaks, and steep cliffs in the south and rolling hills in the north, Hells Hole provides excellent opportunities for a variety of primitive recreation.

In addition, tell the forest supervisor to manage the following areas as roadless and undeveloped for semi-primitive, non-motorized recreation, so as to retain their value for ecological study, recreation, wildlife habitat, and watershed protection:

- 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), and
- areas adjacent to Aldo Leopold Wilderness (170,160 acres) - These tracts are a natural extension of this magnificent resource named after the man responsible for the nation's first designated wilderness area (Gila Wilderness Area).

We invite you to contact the Southwest regional office of The Wilderness Society and the Sierra Club's project coordinator for more information on what you can do to protect the Southwest's remaining wildlands. Please also send them copies of your comments to the forest supervisor.

Jim Norton
The Wilderness Society
234 N. Central Avenue #650
Phoenix, Arizona 85004
(602) 256-7921

Jim Owen
Coordinator, Sierra Club
9905 Cork
El Paso, Texas 79925
(915) 598-9332



THE WILDERNESS SOCIETY
1400 FIVE STREETS N.W. WASHINGTON D.C. 20005

6/15/85
SEP 17 1985

nonprofit organization
U.S. Postage Paid
Permit no. 3127
Washington D.C.

Dear Supervisor
I agree with the document. Since I cannot
say it better, I
sent it to you.
Billy E. Goetz

MR. BILLY E. GOETZ
1314 CAMINO CORRALES
SANTA FE, NM 87501

205-1

Thank you for your comment. Your concerns are similar to those expressed in the letter from the Sierra Club. Please refer to the responses to letter 011.

Sept 15, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico

000206

USA NATIONAL FOREST
Silver City, New Mexico

SEP 17 '85

DATE RECEIVED

Dear Sir,

Please be advised that I am opposed to increases in timber harvests and road construction in the Gila forest. I feel that the remaining natural areas be kept roadless]

I am opposed to timbering and road increases because they are uneconomic, damaging to other forest uses and values and destructive of remaining rangelands.

I support wilderness designation for the Lower San Francisco Canyon and the Hells Hole areas]

I support keeping the following areas roadless and undeveloped for semi-private, non-motorized recreation so as to protect their value for recreation, wildlife habitat and watershed protection.

206-1

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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

206-2

We have re-evaluated our non-wilderness recommendation on the wilderness study areas and feel the non-wilderness recommendation is still appropriate. The rationale for our recommendation is included in the Proposed Action Alternative Summary of Change.

1. Areas along the Mogollon ~~Rim~~ Rim stretching from the Blue Ridge to the Gila wilderness.
2. Freestanding wilderness candidate areas, such as Frisco Box and Eagle Peak.
3. Areas adjacent to Aldo Leopold Wilderness

Please follow your conscience, as forest supervisor you have accepted the obligation to protect and preserve - to act as guardian for this area of the planet which needs our help - and respect.

Sincerely,

Gary Altrichter
103 A El Alamo
Santa Fe, NM 87501

Gary Altrichter

206-5

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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The effects of development on specific areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 207

FOREST SERVICE RESPONSE TO LETTER 207

207-1

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. 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 the new roads constructed would be closed after timber activities are completed. A more complete description of the changes made to the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public comment document.

207-2

No timber or road building activities are proposed in the classified wildernesses on the Forest. These areas are protected from development activities by law.

207-3

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) and through other mitigation measures. These soil loss reduction measures will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long-term productivity. Timber has been harvested from the Forest for over 40 years and the devastating effects that you describe have not occurred. They will not occur as a result of the harvest proposed in the Plan.

207-4

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. The rationale of our non-wilderness recommendation is included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

207-5

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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific areas is displayed in the Proposed Action Alternative Summary of Change.

Valerio and Hugh Rodell
514 Lee
Pucson, A

85705 000207

Forest Supervisor
Gila National Forest
2610 North Silver St.
Silver City, New Mexico
89061

GILA NATIONAL FOREST
Silver City, New Mexico

SEP 16 '85

September 12, 1985 DATE RECEIVED

Forest Supervisor,

We are opposed to the increases in timber harvests and road construction proposed in the management plan for the Gila National Forest. Roads, deforestation, or thinning threaten the existing land uses of the wilderness such as grazing, ecological studies, and hill agriculture. But more importantly, roads destroy the few forests in the Southwest by creating stream beds into washes, causing flooding and road washouts, demanding even higher road maintenance allowance. We support wilderness designation for Lower San Francisco Canyon and Hells Hole.

In addition, we advocate the management of the following areas as roadless and undeveloped: Areas along the Huerfano Rim from the Blue Range to the Gila Wilderness, pre-standing wilderness candidate areas, and areas adjacent to Aldo Leopold Wilderness. Most of all, don't you want any of your family members to enjoy the privacy and serenity of the wilderness after the year 2000?

Sincerely,
Valerio Rodell & Hugh Rodell
Valerio and Hugh Rodell

Copies Sent
Dennis DeConcini, U.S. Senate
Morris Hall, U.S. House of Representatives
Governor Jon Abney, La Grange, NH
Jim Norton, The Wilderness Society

208-1

Sep 11, 1985

000208

Forest Supervisor
Gila National Forest
Silver City, NM

U.S. NATIONAL FOREST
Silver City, NM

SEP 16 '85

DAN MCMILLAN

Dear Sir,

These are my comments regarding
the Draft Management Plan for
the Gila National Forest

The information available to
me indicates that the area
comprising the Gila National
Forest produced a low-grade
timber or else an uneconomic
operation in an area which is
highly susceptible to damage by
timbering operations

On the other hand the
hiking, back packing, hunting, fishing
and horseback riding recreational
uses are to be maintained

2) thousands of people

In addition the preservation
of vegetation and prevention of
soil erosion is critical to the
water shed supplying water to
the areas in the valleys.

In your comment you speak of low-grade timber and uneconomic timber operations. You also speak of recreation opportunities. You do not, however, mention the economics of recreation. First, we disagree that the timber on the Gila is of low grade. Many of the Ponderosa pine stands are capable of producing high-grade lumber. We also do not feel that it is appropriate to single out a forest resource or use and speak to the economics of that use. You infer in your statement that activities that have higher costs than revenues should not be conducted; that timber contractors should not be subsidized. 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.

It also needs to be remembered that the objective of the Forest Service is not to maximize dollar returns. The Plan is an issue driven plan. Commodity outputs do not have to be eliminated for recreation and other amenity demands to be satisfied. We feel that with the changes made to the Proposed Action Alternative a balanced program has been provided that addresses Forest issues and provides for a high level of public benefits. [A summary of the changes made to the Proposed Action Alternative located in the front of the public response document.]

208-2

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) and other mitigation measures. These erosion control measures 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. 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 degrade that supply.

208-3

98,000 over 500,000 acres are
congressionally-designated wilderness
there are approximately half a
million acres of unincorporated
wilderness without protection.

If these the 1. in San Francisco
hanger comprising 600 acres and
Hells, Hells with 15,000 acres }
should definitely be named as
protected wilderness areas

3) I oppose the building of
new roads into the presently
undeveloped areas.

1. Opening up these areas for
development is costly. The
timber sales have shown a
net loss of 25 cents for every
dollar spent to produce and
sell the forest's timber.

Why should we advocate
harvesting the timber at a loss?

2. Roads and timbering damage
or destroy other valuable
multiple uses. Reforestation
is difficult on steep easily
eroded terrain. Erosion and silt
destroy wild life and degrade
water resources.

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the non-wilderness is still appropriate. The rationale for our recommendation is contained in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

208-4

It is not correct to simply state that it is more costly to manage unroaded areas for timber production than other areas on the Forest. Each area of the Forest must stand on its own. Because of high timber volumes per acre some unroaded areas are actually more cost effective than some roaded areas.

You also expressed a concern regarding the cost of timber activities. We have already responded to the subsidy portion of this issue in our response to comment number 1, but we also need to comment on the benefit cost relationship of your concern.

It is not correct to single out individual costs called timber costs, recreation costs, etc., and assign single benefits to those costs. Few single costs result 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 wildlife habitat diversity is maintained or increased. The timber harvest activities open up some stands. Additional wildlife forage becomes available in these areas. Often, wildlife recreation opportunities are increased as a result of these activities. The funds to do this, even though some of the benefits are to wildlife, 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.

208-5

The logging of steep slope areas by means of cable logging generally will require fewer roads and less acres logged. The acres scheduled for cable logging will produce more volume per acre due to the fact that these areas currently have higher volumes per acre. Cable logging activities result in less soil disturbance than the conventional means of tractor logging. Although soil loss will occur, it is not of sufficient magnitude to reduce long term productivity. Areas where reforestation could not be reasonably insured were eliminated from the timber base during the suitable timber analysis.

3 Opening up roads & eliminating large areas from inclusion as wilderness designation
 Once we destroy the prime wilderness qualities we can never regain them

I urge the Forest Service to maintain and manage the Sierra National Forest with the smallest possible road development consistent with a conservative management and to designate to Forest San Francisco Geronimo and Hobbs Hole as Wilderness Areas.

Respectfully submitted,
 Richard A. Lybhead
 4732 East Adams St
 Tucson AZ 85712

208-6

Changes in the Proposed Action Alternative include the reduction of timber harvest and road construction. These changes and changes where timber harvest activity would take place have resulted in less projected development of unroaded areas. 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on specific areas are displayed in the Proposed Action Alternative Summary of Change.

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

GILA NATIONAL FOREST
Silver City, New Mexico

9-12-85

SEP 16 '85

DATE RECEIVED

000209

Dear Sir,

I have recently read with alarm about your Gila National Forest Draft Plan. This calls for more logging and the building of hundreds of new roads in the forest when the present logging industry in this area is already unprofitable. "My subject the land to an increase in this venture?"

I am a school teacher and my family and I spend a great deal of time in the Gila during the summer. Anyone can see that in most places, there is a lot of steep, fragile terrain that is dry and easily eroded. For us, this, and the remoteness, give the Gila its attraction.

Areas adjacent to the Aldo Leopold Wilderness, along the Mogollon Rim and near Eagle Peak and Irisco Box need protecting. I support the designation of Lower San Francisco Canyon and Nell's Hole as wilderness.

If it's the money you need, I would not object to the adoption of a user's fee. Don't forget that people like us spend our tourist dollars in the area. I resupply from Deming, Silver City, Mimbres and others.

The protection of roadless lands is a worthwhile use of the forest and should take a high priority. Please, the Gila is a dear friend, don't hurt it as you propose.

Sincerely,

Mary C. Ray
Ray H. Ray
Mary C. and Ray H. Ray
4509 Abolink
El Paso, TX 79922

cc Gov. Tony Anaya
Senate and Congressional Representatives

209-1

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. This is a 57% 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 85 percent of the new roads constructed would be closed after timber activities are completed. A more complete description of the changes made in the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public comment document.

209-2

Soil loss from logging is controlled by the use of Best Management Practices determined through the State 208 water quality planning efforts. 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. Although soil loss will occur, it will not be significant enough to affect the long-term productivity of the site.

We agree that one of the primary considerations of forest management should be watershed protection. Protection of watersheds was given emphasis in the Proposed Action Alternative. Watershed condition is projected to improve over time as a result of management practices implemented in the Proposed Action Alternative.

209-3

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 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. The development effects of the Proposed Action Alternative on specific areas is displayed in the Proposed Action Alternative Summary of Change.

209-4

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that the non-wilderness recommendation is still appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

209-5

We appreciate your willingness to pay to use the Forest, but 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.

LETTER 210

FOREST SERVICE RESPONSE TO LETTER 210

DIAMOND, RASH LESLIE & SMITH
ATTORNEYS AT LAW

725 FIRST CITY NATIONAL BANK BUILDING
EL PASO TEXAS 79901 1379

000210

TOM DIAMOND
ALAN V. RASH
DONALD S. LESLIE
NELSON SMITH
LARRY A. BASKIND
NORMAN J. GORDON
HENRY C. HOSFORD JR.
1440 104 68 114 114 114

(915) 533-2277

TELECOPIER
(915) 545-4523

September 11, 1985

Forest Supervisor
Gila National Forest
2610 N Silver Street
Silver City, N M 88061

Dear Forest Supervisor Scoggins

I have reviewed the Gila National Forest Summary of the Environmental Impact Statement/Forest Plan. I feel that this is a very objective document and study and I wholly support the conclusions and recommendations of the Forest Service.

My wife and I operate the Corduroy and Alexander allotments. I particularly examined the study from the point of view of the analysis of these allotments and the proposed Forest Plan. I believe that the study of both of our allotments are fair and accurate and that the proposals are quite logical.

I do however have some comments dealing with recreation. It is my opinion that this is an area of Forest Service planning that is not getting the attention it deserves. I refer to the need for adequate interpretation of the various historical archaeological botanical and geographical attractions of the forest. There are just countless places that can be interpreted to make the forest experience far more enjoyable for the average citizen. Old homesteads, remnants of stage roads, military camps and Indian sites should be marked and interpreted for the general public. This should be developed so that the public can fully appreciate the forest treasures.

There needs to be historical interpretation at strategic points, dealing with the various Indian occupations and the early American settlers. The Forest should publish travel logs that correspond with mileage poles telling the visitor what they are passing and seeing. The geology of the area needs to be adequately demonstrated and interpreted.

Wilderness designation, livestock grazing, mining and timbering are all areas that have received a great deal of thought and attention over the years by both the Forest Service and

individuals concerned with specific uses of the Forest. The average family does not benefit from any of these activities. The camp grounds that have been constructed are in general inadequate and are hard to reach. Recreation should be given much greater emphasis than it presently receives because it will some day be your primary use. Recreation planning for the forest should be a high priority as there is no substitute facility to satisfy the accelerating demands of the fast growing urban areas nearby.

Sincerely,


Tom Diamond

TD/cbp

cc Chuck Shipp

cc Jack Diamond

210-1

Thank you for your comment. Interpretation of these resources was not identified by the public as a major Forest issue. Although it would be desirable to interpret various cultural, botanical, historical, and geological resources, the constrained budget within which the Plan was developed and the need to address Forest issues has resulted in a low emphasis on this type of activity.

210-2

The major thrust of the Forest developed recreation program is to provide developed recreation opportunities in a forested environment or adjacent to public lakes. Facilities are located in areas where opportunities can be provided that are not provided by private facilities. We feel that the emphasis in the Proposed Action meets this objective. Existing facilities are maintained and reconstructed when they are no longer serviceable. One new campground at Quemado Lake will be constructed in the first 10 years. Opportunities for additional quality facilities beyond this are limited. We feel that the emphasis is appropriate considering the Forest objectives.

215

west's wildlife and degrading the quality of the region's water supply. The Gila's rich cultural resources would also be exposed to harmful activities, and opportunities for primitive recreation would be lost under the draft plan.

• destructive of remaining wildlands Some of the last large unprotected wilderness in the Southwest is on the Gila National Forest. Rooding and timbering will eliminate many of these areas from consideration as wilderness. The "preferred alternative" also allows damaging off road vehicle use in sensitive roadless areas.

A CONSERVATIONIST ALTERNATIVE

Tell the Gila forest supervisor that you oppose the increases in timber harvests and road construction and that key remaining natural areas must be kept roadless. The timbering and road increases are 1) uneconomic 2) damaging to other forest uses and values, and 3) destructive of remaining wildlands. The Forest Service needs to know you support protection of roadless lands as the best and highest use of the forest.

You can help protect more of the Gila. Of the two areas on the forest considered for possible inclusion in the National Wilderness Preservation System, the plan recommends both for non-wilderness use. Tell the Gila forest supervisor you support wilderness designation for the following areas:

• Lower San Francisco Canyon—(6,700 acres)—Located near the New Mexico-Arizona border near Glenwood, New Mexico, the canyon is a magnificent example of lower Sonoran riparian woodland. A remarkable diversity of plant and animal life is found here, including endangered species such as the bald eagle. Groves of mature riparian vegetation grow on the benches of the outer valley floor. This landscape is fragile, and off road vehicle use will intensify the impact of occasional flooding.

• Hells Hole—(18,860 acres)—Just south of the Lower San Francisco, this area retains its overall natural appearance. Characterized by deep rugged canyons, rocky peaks, and steep cliffs in the south and rolling hills in the north, Hells Hole provides excellent opportunities for a variety of primitive recreation.

In addition, tell the forest supervisor to manage the following areas as roadless and undeveloped for semi-primitive, non-motorized recreation so as to retain their value for ecological study, recreation, wildlife habitat, and watershed protection:

- 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) and,
- areas adjacent to Aldo Leopold Wilderness (170,160 acres) - These tracts are a natural extension of this magnificent resource, named after the man responsible for the nation's first designated wilderness area (Gila Wilderness Area).

We invite you to contact the Southwest regional office of The Wilderness Society and the Sierra Club's project coordinator for more information on what you can do to protect the Southwest's remaining wildlands. Please also send them copies of your comments to the forest supervisor.

Jim Norton
The Wilderness Society
234 N. Central Avenue #650
Phoenix, Arizona 85004
(602) 256-7921

Jim Owen
Coordinator, Sierra Club
9905 Cork
El Paso, Texas 79925
(915) 598-9332



THE WILDERNESS SOCIETY
1111 17TH ST. N.W. WASHINGTON D.C. 20036

nonprofit organization
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211-1

Thank you for your comment. Your concerns are similar to those expressed by the Sierra Club. For responses that address your concerns, please refer to the responses to comments in letter 011.

000211

MS. JOAN BERDE
GENERAL DELIVERY
LLANO, NM 87543

LETTER 212

FOREST SERVICE RESPONSE TO LETTER 212

LOS ALAMOS MEDICAL CENTER

LOS ALAMOS NEW MEXICO 87544 • (505) 662 6747

000212

September 12 1985

Forest Supervisor
Gila National Forest
2610 N Silver St
Silver City New Mexico 88061

GILA NATIONAL FOREST
Silver City New Mexico

SEP 16 1985

DATE RECEIVED

Dear Sir

I am writing to express my concern and dismay about the Forest Service's proposed management plan for the Gila National Forest. This is a beautiful section of the State that should be preserved in as pristine condition as possible. It is alarming to me that you find it necessary to recommend increasing timber harvesting and road building in such a fragile and lovely area. It has been pointed out that this is particularly foolhardy considering how uneconomical timber harvesting is in this area, and how damaging it can be to the surrounding wild lands. I hope that you will reconsider this management plan and in fact would hope that you would recommend inclusion of more acreage in its surrounding wilderness areas.

Thank you for your kind attention.

Sincerely yours

Philip H. Newman, M.D.

PHN lth

CC Tony Anaya Santa Fe
Senator Pate Dominic
Representative Bill Richardson

212-1

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. 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 the new roads constructed would be closed after timber activities are completed. A more complete description of the Proposed Action Alternative Changes can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public response document.

212-2

Your concerns regarding the economics of timber activities and the environmental effects of these activities were addressed in response to the El Paso Sierra Club letter [letter 11]. Please see our response to this letter.

000213

1701 W. 17th Ln.
Portales, NM 88130
Sept 13, 1985

Forest Supervisor
Gila National Forest
2616 N Silver St
Silver City, NM 88061

Dear Sir

It is my understanding that you have recently drafted a plan for the management of the Gila National Forest for the next 50 years. As I understand it, your plan call for large increases in the timber harvest and a massive road building program.

It is also my understanding that the present program losses money - costing taxpayers a total of \$5 million over the last 5 years - because the companies making money off of our public lands pay too low a price for the privilege.

I am outraged that you would draw up a plan which favors those interests and offers no protection to the future citizens of New Mexico. New Mexico's ecology is too fragile to stand such degradation. And it risks salt in the wound when you don't even make such programs pay their own way!

WAL
JUL 1 1985
VJ
10/1/85

Yours,
Adele Breech
Adele Breech

213-1

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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

213-2

In your comment you mention the cost to the taxpayers of the timber sale program and state that such programs should pay their own way. There are two aspects of this comment that we need to respond to. First, it is not correct to single out a single cost and a single benefit for any Forest activity. Most management activities benefit more than one resource. For example, timber harvest can result in increased wildlife habitat diversity and additional forage. Yet the total costs to prepare and manage the timber sale are called timber costs. All benefits and all costs to manage an area must be considered in order to properly analyze the economics of management.

Secondly, you say that timber should pay its own way. 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 permits, 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.

5122 East Citrus Street
Tucson, Arizona 85712
September 11, 1985

000214

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir,

We wish to comment on the Gila National Forest Draft Plan

We vehemently oppose any increase in timbering and road construction. In the last five years Gila NF timber program lost over $2\frac{1}{2}$ millions of taxpayer money. The steep terrain erodes easily after being timbered, thereby ruining the watershed and quality of the water supply. Protection of roadless lands is the best and highest use of the Gila National Forest.

Two areas deserving of wilderness protection have been left out. Lower San Francisco Canyon - a fine example of Sonoran riparian woodland, which is fragile and easily ruined by off-road vehicles.

Hells Hole - a natural area providing a variety of primitive recreation.

There are areas that should be managed as roadless and undeveloped:

- ① 125,855 acres along Mogollon Rim from Blue Range to Gila Wilderness
- ② Irons Box (40,050 acres) and Eagle Peak (30,180 acres)
- ③ 170,160 acres adjacent to Aldo Leopold Wilderness.

Sincerely,
" " " Brother P.D.P.

214-1

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. 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 the new roads constructed would be closed after timber activities are completed. For a more complete description of the changes in the Proposed Action Alternative, see the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

214-2

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated totally from reviewing the dollars received from stumpage. Timber sales often increase wildlife habitat diversity and result in increases in forage for wildlife and domestic livestock. These are additional values that are derived from the sale program which are not considered in the appraisal process. As a result of this joint benefit situation it is not correct to assess all of the costs of one activity to only one benefit.

214-3

We disagree that steep slope logging will cause excess erosion and result in ruining watersheds. 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. The Plan would actually increase watershed condition over time.

214-4

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for the non-wilderness recommendation is included in the Proposed Action Alternative Summary of Change.

214-5

Of the approximately 698,000 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on individual areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 215

FOREST SERVICE RESPONSE TO LETTER 215

Edgar Allen Telf
2700 North Indian Street
Albuquerque, NM 87106
11 Sept 1985

000215

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sirs:

Because we are all busy I will make this brief. I am unalterably opposed to the "hamburgerization" of the Gila. I understand the "Draft Management Plan" envisages double timbering and 1500 miles of roading. We all know that "to road is to erode", and that mothsticks are merely that.

In this bottom-line-world, how hard it is to opt for intangibles!

I believe that you should manage our remaining forest lands in a holding pattern until wilderness designation can, with future-related judgment, save them.

Cordially yours

Edgar Allen Telf

215-1

The original Proposed Action Alternative would have resulted sawtimber harvest of approximately 35 MMDF per year in the first decade. The volume was projected to increase to approximately 41 MMDF by the fifth decade. The modified Proposed Action Alternative projects a timber harvest of approximately 30 MMDF in all decades. This change results in a 57 percent reduction in the amount of roads that would need to be constructed and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes. We feel that the modified Proposed Action Alternative provides for balanced use of the Forest's resources.



Jeanne Williams

000216

MEMBER
AUTHORS GUILD
WESTERN WRITERS OF AMERICA

BOX 335

PORTAL, ARIZONA 85632
(602) 558 2436

Sept 9, 1985

Forest Supervisor
Gila National ForestL. J. Williams
S. J. Williams

8/1/85

Dear Supervisor

DATE REC'D

Since the Gila Wilderness was the first designated such in the U S it seems especially important to preserve that character

I therefore hope that timbering will be reduced or halted instead of increased. Since the timbering program gets back less than a quarter of the money expended on it, it is uneconomic as well as devastatingly damaging to the unique regions encompassed

Roadbuilding certainly degrades wilderness and I hope will be kept to a minimum

In order to protect watershed, wildlife and maintain places as nearly as possible to their natural beauty, I urge that Mill's Hole Canyons and Lower San Francisco Canyon be preserved as Wilderness

I used to live under the Mogollon Rim. This magnificent stretch from Blue Range to Gila Wilderness should be kept free of vehicles. A region can always be opened up. Once savaged and eroded, it may never recover. As guardian of this lovely country, I appeal to you to give the utmost consideration to keeping the Wilderness wild

Sincerely,

Jeanne Williams

216-1

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 25 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 20 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 1,450 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 sixty-five percent of the new roads constructed would be closed after timber activities are completed. A more complete description of the changes in the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public comment document.

You also comment on the economics of timber harvest and on the destruction that would result from timber activities. These concerns were addressed in detail in the our response to the El Paso Sierra Club letter. Please refer to this letter [letter 11] for our response to these concerns.

216-2

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

216-3

Because of the changes in the Proposed Action Alternative, the development effects on unroaded areas has been reduced. Of the approximately 698,000 undeveloped acres outside of the classified wilderness, 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on individual unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

945 Canyon Road
Santa Fe, New Mexico
87501
September 11, 1985

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

000217

Dear Sir

I am troubled by the draft management plan proposed for the Gila National Forest. The increase in timber harvest and the massive road building program would be destructive and uneconomical. In previous years the sale of Gila timber has lost money and cost taxpayers dearly. There seems no good reason for increasing such losses. The terrain would be difficult to reforest, and cutting timber would cause serious erosion. Construction of 1500 miles of new road would not only be expensive it would also destroy thousands of acres of wild lands which should be left undisturbed.

I support wilderness designation for the Lower San Francisco Canyon and Hells Hole. In addition the following areas should be maintained as roadless and undeveloped to protect the watershed and wildlife habitat:

areas along the Mogollon Rim
freestanding wilderness candidate areas, such as Frisco Box
areas adjacent to Aldo Leopold Wilderness.

I hope serious consideration will be given these matters before final plans are adopted.

Sincerely yours
Harriet D. Pennington
(Mrs) Harriet D. Pennington

217-1

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 20 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 1,450 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 the new roads constructed would be closed after timber activities are completed. A more complete description of the changes in the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public comment document.

You also comment on the economics of timber harvest and on the destruction that would result from timber activities. These concerns were addressed in detail in our response to the El Paso Sierra Club letter. Please refer to this letter (Letter 11) for our response to these concerns.

217-2

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

217-3

Because of the changes in the Proposed Action Alternative, the development effects on unroaded areas have been reduced. 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The development effects on individual unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

LETTER 218

FOREST SERVICE RESPONSE TO LETTER 218

000218

1218 South Drive
Socorro, NM 87801
September 9, 1985

Kenneth C. Scoggin
U. S. Forest Service
2610 N. Silver Street
Silver City, NM 88061

Dear Mr. Scoggin:

Comments on the Proposed Gila National Forest Plan and the DEIS
are enclosed.

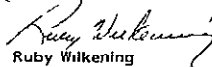
Our purpose is to view the Gila Forest as a valuable natural resource
to be used, enjoyed, and preserved for present and future generations.

We appreciate the opportunity to review these documents.

Sincerely,



Marvin Wilkening



Ruby Wilkening

amg

LETTER 218

FOREST SERVICE RESPONSE TO LETTER 218

Comments on the Environmental Impact Statement and Forest Plan for the Gila National Forest - 1985

Our comments on the Gila are based on first-hand observations through camping, hiking, hunting, and fishing beginning about 1949 and from visits to our cabin on Indian Creek (USFS lease beginning in 1953). It was my privilege to work for the passage of both the Wilderness and Multiple Use Acts in 1964. Although our interests are primarily recreational, we have a strong appreciation of the importance of grazing and timber production to our neighbors in southwest New Mexico. The growing value of recreational visits and tourism to these same areas must be recognized, however.

The notes which follow pertain to the issues listed on pp. 1-2 of the DEIS. The forest of primary concern is the country from Mogollon east to Bearwallow, Willow Creek, Snow Lake, and Beaverhead (4A, 4D, and 6B).

A. Timber

1. The amount of saw timber under PA appears high in view of
 - a. Commercial timber operations in the Gila leave too much waste. That part of the tree not converted into lumber should find a market as fiber, post, or fuel wood at the highest economic return. Overall income from timber sales must be increased.
 - b. The removal of overstory or clear cutting greatly increases the loss of soil moisture for the early growing season through increased vertical transport of water vapor from the ground through the effects of insolation and a much sharper wind profile near the ground. The losses of timber through windfalls has been very high after logging in areas like the Gila mesas where strong spring winds are common and the soil is quite shallow. There are many "Baldys" in our southwest mountains for good reasons.
2. The proposed logging of steep, north-facing slopes of 40% or more will have negative effects on
 - a. spring runoff since currently snow banks persist through April and May,
 - b. havens for wildlife in the summer and fall seasons, and
 - c. the remaining relics of the virgin forest in the out-over areas. If the increasing numbers of visitors can't see a few 400 year old fir trees outside of the wilderness they, and succeeding generations will be robbed of a true forest experience.
 - d. these pockets are important for the support of endangered species - plants and animals.

218-1

We agree that where possible the waste from timber sales should be reduced. We have included standards and guidelines in the Plan that provide for fuelwood harvest of logging slash and defective trees not taken from the Forest. It would be ideal if a fiber market existed, but to date there has been no interest in purchasing the type of material to which you refer. Depending on the location, it is also difficult to get people to utilize logging slash for fuelwood. We will continue to be aware of this situation and do everything we can to encourage better utilization of our timber resources.

218-2

The primary silvicultural system prescribed in the Plan is the shelterwood system. Prescriptions are designed to provide enough protection of the site so that the changes in microclimate that you describe are not severe enough to change the vegetative potential of the area. Moisture regimes are kept high enough so that regeneration can be established.

Some loss of timber from windfall will most likely continue to be a problem in areas like the one that you describe. We will continue to monitor this situation and try to design silvicultural prescriptions to minimize the effects.

218-3

We disagree that steep slope logging will have a significant negative effect on runoff. Cable logging of steep slopes projected in the modified Proposed Action Alternative would only result in logging approximately 800 acres annually on the whole Forest. This should not result in significant changes in timing of snow melt.

218-4

We disagree that steep slope logging will have a significant negative effect on wildlife. Again the acreage affected is a relatively small portion of the total steep slope timbered area on the Forest. Wildlife habitat needs are integrated into harvest prescriptions so that needed habitats are maintained and so that distribution of habitats are improved.

218-5

The original Proposed Action Alternative projected an increased timber harvest over time. The modified Proposed Action Alternative projects the harvest of approximately 20 MMBF per year over time. This is equivalent to the average of the amount sold on the Forest in the last 10 to 15 years. The volume coming from steep slopes was also reduced. (See the Proposed Action Alternative Summary of Change located in front of the public comment document.) This level of harvest can be sustained from 62 percent of the tentatively suitable area. Thirty-eight percent of the tentatively suitable acres on the Forest will remain unharvested. No timber harvest is proposed in 4D and only a small portion of 4A will be harvested in the modified Proposed Action Alternative. The unharvested portions of the Forest should continue to provide many areas where visitors to the Forest can see old growth timber.

218-6

We agree that the old growth habitat that you refer to is important. The original Proposed Action Alternative projected a reduction of 24 percent in old growth habitat in a 50 year period. The modified Proposed Action Alternative is projected to only reduce old growth habitat by 12%. This should not significantly affect wildlife species that are dependent on old growth habitat.

- 3 The negative impact of logging operations on various recreational activities especially visual quality of the forest to casual visitors would be greatly reduced if timber sale management compressed the building of temporary access roads, logging, slash pickup and burning, thinning, and more burning into a two-year period at most. The Indian Creek sale in 1971 required a total of about 10 years to accomplish these operations

- 4 It is evident that research is needed in ways to increase the productivity of ponderosa pine stands (in these low latitudes, thinning alone can have some negative effects as noted above)

We recommend alternative A until some of these concerns about timber management can be addressed

- B Grazing Management of the grazing load is perhaps more important than the actual MAUM. However, the reduction for 1985 in the north Gila high country has had a beneficial effect. In previous years, marked damage has occurred to vegetation on and around the meadows such as Bill Lewis and Turkey Cienegas (Bearwallow), N-, and in Indian Creek canyon. Raspberry, currant, elderberry, and other bushes were almost eliminated in parts of the Bearwallow country following timber cutting in the late 1960's and the heavy grazing increase which followed. The Indian Creek meadow formerly had a good stand of grass carry over the winter for the turkeys and elk to use when they came back in March and April. In recent years there have been no grass seed heads for the turkeys due to heavy use by cattle attracted both by the availability of water and grass in the fall and early winter. It was not that there wasn't enough grass elsewhere on the mesas, they just weren't using it. Management is very important as well as limiting the numbers of MAUM. If management intensity can continue to be improved, as outlined under PA, then a level of use as occurs under A is suggested

C Fish and Wildlife Habitat

- 1 The North Gila elk, deer, antelope, and turkey hunting pressure has increased phenomenally in the past three decades. The same increase in use is true of the Snow Lake fishing resource. The Forest Plan must accommodate this demand through limitations on vehicle access and grazing management as noted in B above. Undisturbed spruce and fir stands in the high country are needed for the limited dusky grouse populations in the Willow Mountain and Bearwallow areas. The Sonoran white-tail deer are becoming very scarce in this area also. Are its habitat needs being met? It was good to see that turkey roost areas were being given much needed consideration in the Forest Plan. Critical habitats for the bald eagle, peregrine falcon, and Gila trout must be considered because they are threatened species in this country

218-7

Time periods allowed to complete the activities that you mention vary depending on the size of the timber sale. On small sales (2 MMBF or smaller) contractors are allowed two (2) operating seasons to complete the activities. On large sales (25 MMBF or above) the time period is lengthened to six (6) operating seasons or longer. On large sales this amount of time is often needed to complete all of the activities.

We agree that the negative impact of logging operations on recreational activities is reduced if timber sale activities can be compressed into as short a time frame as possible. We will continue to try to keep these time frames at a minimum.

218-8

We agree that more research is needed. The Forest Service Forest and Range Experiment Stations continue to research this problem.

218-9

We feel that the combination of increased management and some permitted livestock reductions is the best way to continue to improve the range resource. A more complete rationale for our proposed level of range management is included in the Proposed Action Alternative Summary of Change

218-10

We have coordinated management of elk and turkey with the New Mexico Department of Game and Fish and feel that we can meet approximately 90 percent of their elk objective and 100 percent of their turkey objective by the habitat management activities proposed in the Plan. The available deer habitat should also provide an opportunity for increased deer numbers. Changes in the draft Plan provide for maintaining most of the presently unroaded area around Bearwallow in an undeveloped condition, therefore little disturbance of the dusky grouse populations is expected. We feel that the off-road vehicle restrictions imposed by the Game and Fish Department during hunting seasons should reduce the negative effects of this type of activity. The modified Proposed Action Alternative provides for balanced use of the Forest and the area with which you are concerned.

218-11

- 2 One of the most serious deficiencies of the Forest Plan is the lack of a program to restore the stream fisheries resources in the area following the record floods on December 17, 1978, October 2, 1983 and December 28, 1984. In many cases the stream beds which provided good trout holes with food and cover have been replaced with raw cut banks and barren gravel beds. See more below

Alternatives PA and/or B preferred

- D Watershed and Erosion All-time record flooding has occurred in the Gila in recent years with consequent severe soil and habitat losses. "Peak-of-record" flows have occurred as follows

San Francisco at Alma (below Mineral Creek) -- Oct 2, 1983

Gila River -- December 18, 1978

Mimbres River -- December 28, 1984

(from Water Resources Data Reports, USGS)

Judging by trees destroyed, flooding of this magnitude has not occurred for hundreds of years. The damage to grazing, wildlife, and fishery resources is tremendous. The riparian habitat in the Gila country will not recover without assistance for many decades to come.

This problem should be addressed in the Forest Plan. Some features such as removal of timber from

steep north slopes and the increased timber harvest as indicated in PA will aggravate this situation. An increase in silt load in the upper Gila Creek was clearly noted in the spring and late summer runoff following the logging of the Bearwallow country in the 1960's.

In our opinion, none of the alternatives listed give adequate allowance for Water Yield, Watershed, or Soil Loss in the view of the flood damage to the country in recent years.

- E Wilderness We recommend the Hell's Hole and Lower Frisco areas for Wilderness classification.

We respectfully request your consideration of these matters in the final drafts of the Forest Plan and DEIS for the Gila National Forest in these critical years ahead.

Marvin and Ruby Wilkening
9/9/85

amg

We agree that the stream fisheries resource and the riparian area on the Forest received damage as a result of recent floods. We feel that the best way to restore the fisheries resource is to work toward stabilizing and improving the condition of the riparian areas. The Forest Plan contains standards and guidelines that provide for planting, seeding, and other management activities designed to improve riparian habitats that are in low condition as a result of floods or past management activities. Our management intent for riparian areas has been clarified by the addition of several standards and guidelines to the "Forestwide" section of the Plan and by including the riparian standards and guidelines that were in the Region 3 Regional Guide.

Even with this increased emphasis on riparian management, restoring the areas that are presently in 'low condition will take time.

You also mentioned soil loss in your comment. Soil loss from timber activities is projected to be 43 percent less in the modified Proposed Action Alternative than in the original Proposed Action Alternative. As in the original Proposed Action Alternative, watershed condition is expected to improve over time and total soil loss is expected to be reduced below present levels. We feel that the modified Proposed Action Alternative provides balanced consideration of the soil and water resources of the Forest.

218-12

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas on the Forest and continue to feel that the recommendation is appropriate. The Proposed Action Alternative Summary of Changes in the front of the public comment document contains the rationale for our recommendation.

LETTER 219

FOREST SERVICE RESPONSE TO LETTER 219



United States
Department of
Agriculture

Soil
Conservation
Service

517 Gold Avenue SW, Rm 3301
Albuquerque, NM
87102

000219

September 9, 1985

Mr Kenneth C Scoggin
Forest Supervisor
Forest Service
2610 N Silver Street
Silver City, NM 88061

Dear Mr Scoggin

The Gila National Forest Planning documents have been reviewed

The preferred action alternative is consistent with multiple use concerns and USFS budgetary constraints. We hope that the long-range plan is flexible for future advances in technology for improving natural resource productivity and in reducing losses from soil erosion.

Sincerely,

Ray T. Margo Jr.
State Conservationist

219-1 Thank you for your comment.

000220 10 Sept 85
4425 Big Sky Dr
Las Cruces NM 88001

Forest Supervisor
Gila National Forest

114-16-001-103-85
3/18/85

SEP 17 1985

Dear Sir

I am concerned about the ^{new proposed} Gila National Forest draft plan. I am opposed to the increases in timber harvests and road construction. I believe both are uneconomic to taxpayers, damaging to other forest uses, and destructive of remaining wildlands. I also support wilderness designation for the following areas: the Lower San Francisco Canyon and Hell Hole. I hope you will take my viewpoints into consideration.

Sincerely yours,
Walter M. Muzika

220-1

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. 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 the new roads constructed would be closed after timber activities are completed. A more complete description of the changes in the Proposed Action Alternative is included in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

220-2

We have re-evaluated the our non-wilderness recommendation on the two wilderness study areas and feel the recommendation is still appropriate. The rationale for our recommendation is included in the Proposed Action Alternative Summary of Change.

221-1

As a result of changes made in the Proposed Action Alternative, the development effects on unroaded areas has been reduced. 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 percent of the existing unroaded area on the Forest would be developed during the life of the Plan. The effects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

221-2

We disagree that the timber harvest planned in the original or the modified Proposed Action Alternative would occur in the least economic areas. The economic planning model used on the Gila assures that the Plan objectives are met in the most cost efficient areas. Timber harvest is not planned in the least economic areas.

221-3

In your concern you mention several factors that you feel will be affected as a result of timber and road activities. These include erosion, effects on riparian areas, damage to wildlife habitat, degradation of the region's water supply, and elimination of remaining unroaded areas. We have addressed the effects of the modified Proposed Action Alternative above. We feel that we need to address each of the other concerns 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, 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.

Our management of riparian habitats has been clarified in the modified Proposed Action Alternative (see the Proposed Action Alternative Summary of Change). As stated in the draft Environmental Statement, riparian areas are expected to improve rather than be jeopardized as you suggest. This improvement is added by the changes in the Proposed Action Alternative.

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 degrade that supply.

Sept 8, 1985
Marion B. McConochie
4837 N. Via Entrada
Tucson AZ 85718

000221

With Admin
Subject: 000 11 11

SEP 12 '85

DATE RECEIVED

Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City
N.M. 86361

Dear Sir:

I strongly urge you to oppose the U S Forest Service draft management plan for the Gila National Forest issued in June 1985

It would severely threaten critical roadless lands and multiple uses on the Gila. Enormous timber harvests over the next four decades would be in the least economic areas. The roads required for this would violate the wilderness aspects and jeopardize uses of roadless areas for:

watersheds
wildlife and fish species which depend on the riparian habitat of the Gila and San Francisco river systems.
people who hike, fish, horseback ride and study wilderness ecology

Besides, it would cause erosion and degrade the quality of the region's water supply

Roadless areas keep wildlands wild. Wilderness areas can NEVER increase. We must treasure and preserve the few that remain, a precious southwest heritage

]1

]2

]3

Wilderness designation should also be given to the following
 Lower San Francisco Canyon
 Hell's Hole
 And these areas should be managed as roadless so as to retain
 their value for ecological study, recreation, wildlife habitat
 and watershed protection
 areas along the Mogollon Rim stretching from the
 the Blue Range to the Gila Wilderness
 Frisco Box and Eagle Peak,
 areas adjacent to Aldo Leopold Wilderness

4
5

With high hopes that YOU understand our southwest unique wild-
 lands and what their protection means,

Yours cordially,

Marion B. Miller

222-4

We re-evaluated our non-wilderness recommendation on the wilderness study
 areas and feel that the non-wilderness recommendation is still appropriate.
 The rationale for this recommendation is included in the Proposed Action
 Alternative Summary of Change.

222-5

As mentioned in our response to your comment 1, the development effects on
 unroaded areas have been reduced in the modified Proposed Action
 Alternative. The effects on specific areas is displayed in the Proposed
 Action Summary of Change.

000222

Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, N.M. 88061

GILA NATIONAL FOREST
Silver City, New Mexico

SEP 12 '85

DATE RECEIVED

1855 Evans Place
Las Cruces, N.M. 88001
September 10, 1985

Dear Sir:

Through The Wilderness Society I have learned of the Forest Service's "preferred alternative" management plan. As it is described in the enclosed copy, I very much oppose it and urge much more protective alternatives. I regret very much that the USFS seems to be going with the spirit of the times in Washington which favors profiteering exploitation of forest lands over conservation and expansion of priceless wilderness areas. Is Watt still with us?

As the enclosed docket points out, timbering would be and has been uneconomic. Why support a losing program? Timbering and roading encourage erosion and this degrades the water supply. Reforestation is difficult on the typical steep slopes. If some 1500 miles of roads go in, many areas will be damaged and ineligible for consideration as wilderness.

We need more wilderness, not more roads or uneconomic timber. For many years I've hiked with friends through quite a few of the lands in the Gila Wilderness and in its immediately adjoining areas. I support wilderness designation for 1) the Lower San Francisco Canyon and for 2) Hells Hole. I also urge you to supervise as roadless and undeveloped for semi-primitive non-motor recreation 1) areas along the Mogollon Rim from the Blue Range to the Gila Wilderness, 2) freestanding wilderness candidate areas, like Frisco Box and Eagle Peak, and 3) areas next to Aldo Leopold Wilderness

Sincerely,

Weldon Lamb
Weldon Lamb

cc: Gov. Tony Anaya, Senators Domenici and Bingaman, Rep.
Skeen, Jim Norton (The Wilderness Society) and Jim Owen
(Sierra Club)

222-1

Thank you for your comment. Your concerns are similar to those expressed by the Sierra Club. For responses that address your concerns, please refer to the responses to comments in letter 011.

Slick & Associates, Inc.

000223

144 Bridge Street (505) 425 7581
Mailing Address P.O. Box 2164
Las Vegas New Mexico 87701

September 11, 1985

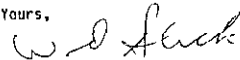
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir

My best time in nature has been spent in the Gila National Forest

For that reason I oppose the expansion of timbering and extension of roads to
the degree drafted in your "preferred alternative" plan]Instead, I wish you would consider expansion of designated/protected
wilderness areas

Yours,



W.D. Slick, Developer

WS/kg

223-1

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 24 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. 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 85 percent of the new roads constructed would be closed after timber activities are completed. A more complete description of the changes in the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change. This summary is located in the front of the public comment document.

LETTER 224

FOREST SERVICE RESPONSE TO LETTER 224

000224

John F. McNelly
3011 Sunrise Avenue
Alamogordo, NM 88310
September 11 1985

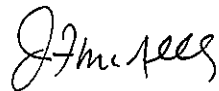
SEP 11 1985
U.S. FOREST SERVICE
ALAMOGORDO, NM

Supervisor
Gila National Forest
Silver City, NM 88061

Sir

I am not a member of that organization, but I support the position of the Sierra Club in opposition to provisions of the proposed management plan for the Gila that propose significant increases in roadbuilding and timber cutting.
Please note my opposition

Sincerely,



224-1

Thank you for your comment. Your concerns are similar to those expressed by the Sierra Club. For responses that address your concerns, please refer to the response to comments in letter C11.

000225

El Paso, Texas
7 Sept, 1985Forest Supervisor
Gila National Forest
Silver City, N.M. 88061

Dear Sir:

My comment on the Gila National Forest draft
management plan is:

- a. Do not increase the timber harvest. This increased harvest will interfere with other uses too much and will damage the habitat. There is already too many roads. The proposed timber harvest would not be to the TAXPAYER'S benefit. Our scarce and precious Gila Forest deserves better protection!
- b. Provide better management and protection to the forest areas near and adjacent to the Aldo Leopold Wilderness than you propose. These adjacent areas should receive WILDERNESS DESIGNATION!

Yours Truly,
C. J. Osterlag
CARL J. OSTERLAG
222 SHADOW MOUNTAIN #42
EL PASO, TX. 79912

COPY TO:

Senator L. Bantson, U.S. Congress
Senator P. Gramm, U.S. Congress
Rep. R. Coleman, U.S. Congress
Gov. T. Anaya
Sierra Club.

225-1

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 24 MMBF. The existing allowable sale quantity is 54 MMBF. The original Proposed Action Alternative projected construction of approximately 1,450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 600 miles of roads. This is a 57% 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 sixty-five percent of the new roads constructed would be closed after timber activities are completed. A more complete description of change can be found in the Proposed Action Alternative Summary of Change in the front of the public comment document.

225-2

Of the approximately 690,000 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. A description of the development effects on specific areas is included in the Proposed Action Alternative Summary of Change.

226-1

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 830 miles of roads. This is a 57% 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 sixty-five percent of the new roads constructed would be closed after timber activities are completed. A more complete description of these changes can be found in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

226-2

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 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 firewood 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 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.

226-3

We disagree. Cable logging activities (steep slope logging) 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 or result in significant deterioration of riparian areas or degradation of the region's water supply.

000226

Tucson, Arizona
September 7, 1985

Forest Supervisor, Gila National Forest
2610 North Silver Street
Silver City, New Mexico 88061

Dear Sir:

We have made many trips into the Gila National Forest, backpacking in wilderness areas and car trips in many other areas, and consider this country unsurpassed in its beauty and recreational value.

We oppose the Forest Service's "preferred alternative" in the draft management plan for the Gila because it calls for a large increase in timber harvest and a huge road building program.

Timber harvests are notoriously uneconomic, and removing vegetation from the steep terrain will damage riparian habitat and degrade the region's water supply.

1
2
3

Remaining
wildlands will be damaged beyond consideration as wilderness.] 4
Protection of roadless lands are the best and highest use
of the forest, both now and for the future.

We support wilderness designation for the following areas:] 5
Lower San Francisco Canyon and Hells Hole.

Further, we support the management of the following areas] 6
as roadless and undeveloped for semi-primitive, non-motorized
recreation, so as 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,
Freestanding wilderness candidate areas, as Frisco
Box and Eagle Peak,
Areas adjacent to Aldo Leopold Wilderness.

Very truly yours,

cc Senator Dennis DeConcini
Senator Barry Goldwater
Representative Morris Udall
Representative Jim Kolbe
Governor Tony Anaya
Jim Norton, Wilderness Society
Jim Owen, Sierra Club

Janice G. Luetke
Janice G. Luetke
Steven L. Coleman
Steven L. Coleman
Arista L. Coleman
Arista L. Coleman
3401 E. River Road
Tucson, Arizona 85718

226-4

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. This means that only 3% of the existing unroaded area on the Forest would be developed during the life of the Plan. The effects of development on specific areas is displayed in the Proposed Action Alternative Summary of Change.

226-5

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the recommendation is still appropriate. The rationale for our recommendation is included in the Proposed Action Alternative Summary of Change.

226-6

Please refer to response number 226-4 for a discussion of the undeveloped acres outside classified wilderness.

Domestic Exploration Department
 94 Inverness Terrace East Suite 200
 P O Box 3976
 Englewood Colorado 80155
 Telephone (303) 790 7600

union
MOLYCORP

000227

September 6, 1985

Head Office
 P.O. Box 44945
 Los Angeles, California 90044
 (213) 977 7834

Kenneth C. Scoggin, Forest Supervisor
 Gila National Forest
 2610 North Silver Street
 Silver City, NM 88061

Re Proposed Draft Environmental Impact Statement
 Gila National Forest Plan

Dear Mr. Scoggin:

We have reviewed the Proposed Gila National Forest Plan and Draft EIS. The following are identified as our major issues since a number of the management areas presently have or may have in the future a potential for mineral and energy resources:

- 1) In management areas identified as having favorable energy or mineral potential we favor alternatives which allow access to, exploration and prospecting for, and development and production of these resources.
- 2) In management areas where insufficient information exists regarding energy and mineral potential, we favor alternatives which would allow for adequate evaluation of the energy and mineral resource potential.

Thank you for the opportunity to comment on the Draft EIS and for consideration of our views. Please place us on your mailing list to keep us current with your land use planning efforts.

Sincerely,

Michelle Northcutt
 Michelle Northcutt
 Landman

MN/ph
 cc J D Wells
 W G Zinn

227-1

Thank you for your comment. Although none of the alternatives feature mineral activities, none of the alternatives prohibit the exploration and extraction of minerals unless prohibited by Act of Congress: i.e., wilderness except where valid claims existed prior to the deadline set by the Act.

LETTER 228

FOREST SERVICE RESPONSE TO LETTER 228

Box 687
Mesilla, N M. 88046

Sept 6, 1985

Forest Supervisor
Gila National Forest
2610 N Silver St
Silver City, N M 88061

400000

000220

FFI

Dear Sir:

Following are our comments on the proposed Gila National Forest Plan and Draft Environmental Impact Statement

We strongly support Alternative F - Noncommodity Emphasis for the following reasons

1 We believe the US Forest Service has never tapped the tremendous recreation potential of the Gila National Forest. Recreation can be made a commodity if one chooses to measure the monetary gain in local communities generated by recreational visitors. In terms of dollars & cents, recreational use generates much more income for the local & regional taxing authorities than would any of the other alternatives. If the Gila NF chooses to emphasize recreation, the monetary gain for local and regional government will multiply

2 Under Alternative F, the period 5 output would be much less in grazing than under the other alternatives. However, at the end of 50 years, consumption of red meat in the US will be cut drastically because of the danger of saturated fats in the diet. The figures showing demand for increased grazing capacity must not be factoring in the change in dietary habits of Americans

3. The projected need for commercial fuelwood is another environmentally unsound use. The amount of fuelwood being burned in Albuquerque, El Paso, Las Cruces, etc. should not be allowed to increase since air pollution in these communities already is reaching dangerous levels during the winter months. Increasing the available amount of fuelwood constitutes irrational thinking or a public-be-damned attitude. This increased fuelwood burning will also increase the problem of acid precipitation

4 The preferred sawtimber alternatives (Alt. D) and (Alt. FA) propose MMBF to be considerably in excess of the 14 yr avg of 37 MMBF. Under the free trade policies of the government, Canadian timber can be imported into the US at less cost than American timber. The timber industry in the Northwest is in a state of recession. This US timber going begging today is in existing cutting areas - not in areas which would need to be developed as would the additional acreage proposed for cutting in the Gila. The economic benefits of stressing the saw timber alternative seem very shaky, indeed

If Alternative F - the Noncommodity Alternative is not chosen, we would suggest Alternative A - Existing Conditions be followed

Listed below in no particular order, are some questions or comments

1 If sawtimbering is increased, please maintain existing vegetational corridors along major roads and thruways

2 Keep road construction to a minimum. Don't develop logging roads unless there is a real demand for timber. One of the USFS Planners at the Sierra Club meeting in Las Cruces mentioned that the USFS would accept a bid as little as \$10.00/MMBF. The public has a right to expect a greater return or no disturbance of the forest environment

228-1

Alternative F, as stated, has the highest PMV, benefits, and E/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 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 net public benefits than Alternative F.

228-2

We feel that the biggest potential for recreation on the Forest is for dispersed and wilderness recreation. All Alternatives will satisfy this demand. We agree that recreation is and will be an important source of revenue to local communities, but we do not see the need to stop all commodity uses on the Forest in order to generate those revenues. Trail maintenance has been increased in the modified Proposed Action Alternative and semi-primitive recreation opportunities are maintained. We feel that these changes result in a balanced use of the Forest's resources.

228-3

Our demand estimates in the Plan were based on historical trends. We have no way to quantify the effects on demand of the type of factors that you mention.

228-4

Fuelwood demand in the Gila began to increase in 1974. From 1978 to the present the average fuelwood harvested from the Forest was about 12.3 MMBF. The modified Proposed Action Alternative provides an average first decade supply (including logging slash) of approximately 12.7 MMBF. We do not feel that this small increase in available fuelwood will provide for a significant increase in air pollution or represents a "public-be-damned" attitude as you state.

228-5

In response to public concern, the sawtimber volume in the Plan has been reduced to 30 MMBF. This is equal to the average volume sold on the Forest in the last 10 to 15 years. (Please see the Proposed Action Alternative Summary of Change for a more complete explanation. The Summary is located in the front of the public comment document.)

228-6

We will continue to meet visual quality objectives along major roads that will assure that scenic values are maintained.

228-7

As a result of public concern, road construction has been reduced along with timber outputs. The projected 50 year road construction has been reduced 57%. Please see the Proposed Action Alternative Summary of Change for a more complete description.

3 We heard at the meeting, that the USFS intends to do away with requiring wilderness permits. We object to this because the permit can be utilized as a management tool to protect certain areas of the wilderness from becoming "worn-out" thru excessive use. Establishing limits on the number of group camping at certain wilderness campsites will be needed to protect the wilderness environment. Incidentally, we would not be opposed to paying a fee to use the wilderness, if some of the funds derived from this source could be utilized to provide better wilderness management, i.e. - patrols, lectures on wilderness camping ethics, etc.

4 We support wilderness designation for the Lower San Francisco Canyon (6,700 acres) and the Hells Hole (18,860 acres) study areas.

5 Along the lines of forest recreation management or the lack of it, we feel that campground development must be accompanied by more intensive management. Where Class A campgrounds exist, you can't depend on the honor system to collect fees and you can't use the excuse of "public resistance" to not collect fees. Would you put your grazing permittees or timber contractors on the honor system? In other words, USFS, get with it and get into the recreation business.

We appreciate the opportunity to comment on the Draft Plan and EIS, and hope you will consider our recommendations seriously.

Sincerely,

Benjamin J. Zerbey

Jane M. Zerbey

228-8

In order to save federal dollars, the wilderness permit system has been eliminated. The system has been in effect for 8 years. The information collected over that period of time has been analyzed and has provided valuable management information. The information collected has indicated that use can be expected to increase at a rate of approximately 2 percent per year. At this rate of increase, the existing data should be adequate to provide management information for the next decade, so we feel that the wilderness permit system is no longer needed. Information will still be provided to visitors at the Cila Cliff Dwellings visitor center and at District offices.

228-9

We have re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel that the non-wilderness recommendation is appropriate. The rationale for our recommendation is included in the Proposed Action Alternative Summary of Change.

228-10

We do not use the excuse of "public resistance" to not collect recreation fees. Most of the campgrounds on the Forest are located in relatively remote locations. It would be very expensive to have a person stationed full-time at these campgrounds in order to assure that all campers pay their fees. Campgrounds are checked on a periodic basis, and anyone found camping without paying is asked to pay or is issued a violation notice.

Sep 5, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver St
Silver City, NM 88061

000229

Subject Gila Natl Forest Draft Plan

I object to the preferred alternative which allows increased road construction and timber harvesting. Please keep the forest in its present wild state. Past experience in other forest have shown that new roads and timber cutting is only a subsidy to the timber companies. The costs are not recovered by the timber sales. 1
2

I suggest that the Lower San Francisco Canyon and Hell's Hole be designated as wilderness areas. 3

Thank you,

George Mader
George Mader
8704 Catalpa
El Paso, TX 79925

228-1

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. This is a 57% 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 sixty-five percent of the new roads constructed would be closed after timber activities are completed. A more complete description of the changes can be found in the Proposed Action Alternative Summary of Change. This summary is located in front of the public response document.

228-2

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.

228-3

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.



United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P O BOX 427
BOULDER CITY NEVADA 89005

000230

IN REPLY
REFER TO LC-159
120 1

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

Dear Mr. Scoggin:

We have reviewed the Draft Environmental Impact Statement (EIS) for the proposed Gila National Forest Plan and have the following comments:

1. Page 4, paragraph 5, and page 187, bottom of page The Bureau of Reclamation (Reclamation) is no longer called "Water and Power Resources Service." The two statements should note the change. 1
2. Page 19, paragraph 1 Habitat improvement for game fish species would negate any increases in threatened and endangered fish habitat. Tiaroga cobitis and Mesa fulgida are known to decline in numbers with any modification of habitat including the increased occurrence of exotic fish species which in this case are the primary game species. 2
3. Page 26 Does Alternative F also include fish or only wildlife? 3
4. Page 34 It is not possible to determine from the table or the discussion whether wildlife forage and herbaceous cover in Alternatives FA, A, B, F and F incorporate quality (i.e., perennial vs. annual grasses) or only quantity. 4
5. Page 42, paragraph 5 If the Lower San Francisco Wilderness Study Area is used by off-road vehicles, it follows that there are anticipated significant biological and physical impacts on the area and that change is expected as a result of a non-wilderness designation. Thus, we disagree with your conclusion of insignificant biological and physical impacts. 5

230-1

We have made the change in the Final Environmental Impact Statement.

230-2

Where T&E species are present, maintenance and improvement of habitat for the T&E species will take priority over exotic game species. This has been clarified in the EIS.

230-3

Both fish and wildlife are included.

230-4

Quality as well as quantity was considered. Table 47 in the Draft Environmental Impact Statement indicates the change in range condition over time. The reduction in unsatisfactory acres indicates that the forage condition is improving.

230-5

The San Francisco River is presently used by ORVs and we do not feel that significant resource damage is occurring. The Canyon was used by ORVs before it was a wilderness study area and has been used by ORVs during the time that it has been a wilderness study area. As explained below, use has actually declined. As a result, we can see no need to maintain the seasonal closure on the area or to extend the seasonal closure.

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 mainstream 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 captors". 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.

We agree that the statement in the DEIS that you reference 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 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.

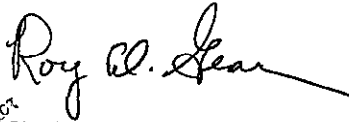
Even though there is no evidence indicating that the limited ORV use in the canyon is causing unacceptable resource damage, there is a conflict between motorized and non-motorized use of the canyon. In order to resolve this conflict and provide for both motorized and non-motorized use of the canyon, 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.

LETTER 230

- 6 Page 43, paragraph 5 We feel this paragraph needs to be expounded on to show why Alternatives A, B, C, D, and E do not propose segments of the Gila and San Francisco Rivers for classification as wild and scenic rivers]6
- 7 Page 68, paragraph 2 The spikedace and loach minnow are now proposed as Federally threatened species (June 1985)]7
- 8 Page 96, paragraph 2 Reclamation has not officially selected Conner Dam as the preferred alternative Resource studies are also being performed on alternatives to Conner Dam]8
- 9 Pages 97 and 98, Wildlife Habitat Small stands of habitat may be managed for more diversity but many species which use these various niches also have minimum area requirements The effect of habitat disturbance on species with minimum area requirements has not been adequately discussed We see this as an issue for grazing and logging discussions.]9
- 10 Page 99 Describe or define the subjective levels used for analysis of alternatives in Table 41]10

Thank you for the opportunity to review the draft EIS.

Sincerely yours,


 107 Edward M. Hallenbeck
 Acting Regional Director

FOREST SERVICE RESPONSE TO LETTER 230

230-6

The rationale for the decision on the San Francisco River and the Gila River is in the Record of Decision and in the Proposed Action Summary of Changes. Please see the Proposed Action Summary of Changes found in the front of the public comment document.

230-7

These species are now T&E species. The text of the Environmental Impact Statement has been changed to reflect the classification of these species.

230-8

This has been corrected in the Final EIS.

230-9

The discussion has been expanded in the Final EIS.

230-10

This table is included to show the relative differences between alternatives. Since it shows relative differences and is somewhat subjective, we do not feel that a definition of these levels is possible. The Webster's definition of the terms used is sufficient.

5201 Garry Owen
El Paso, Tx 79903

September 7, 1985

Forest Supervisor
Gila National Forest
2640 North Silver St.
Silver City, NM 88061

000231

Dear Sir:

The following comments concerning the management of the Gila National Forest along with general recommendations are submitted for your consideration.

1. Because of recently discovered findings in health research and because many doctors, nutritionists, and prestigious organizations such as the American Cancer Society, the American Heart Association, etc. are actively disseminating their recommendations for the reduction of saturated fats in human nutrition, it is predicted that there will be a substantial decrease in red meat consumption in the United States in the next 50 years and that cattle numbers will decline. There will consequently be less need for so much National Forest acreage devoted to grazing by domestic livestock.

2. Because the human population is increasing, because greater numbers of people are relocating in the Southwestern part of the United States, because there is an increasing interest in the recreational use of nearby wild and wilderness areas and because there is a greater awareness of wildlife in general and endangered species in particular, it is thought that the recreational use and scientific study of wilderness and wild forest land will increase greatly in the coming half century.

3. Because there will never be enough wilderness or any more true wilderness and because the present number of wild and scenic rivers are pitifully small in number, it is urged that the Lower San Francisco Canyon and the Hells Hole areas be recommended by the Forest Service for wilderness status and that the wild and scenic rivers in the Gila be designated and protected as such.

4. Because the Gila terrain is largely very rugged and timber harvest is difficult and expensive, increased timber harvest as proposed by the Forest Service "preferred alternative" is opposed. Over the last five years, it cost the taxpayer 23¢ for each dollar spent to produce and sell the timber from the Gila Forest.

5. Because timber harvest on such rugged terrain and its attendant road building will affect land erosion and consequently the water quality from the soil washed into the streams, because the Gila's rich cultural resources would be exposed to harmful activities, and because primitive recreation would be lost under the "preferred" draft plan, prudent management would support protection of roadless lands as the highest use of the forest in the long range public interest.

For the above and other reasons, I reject the Forest Service's "preferred alternative" for management of the Gila for the next 50 years. Instead, I recommend that the forest Service adopt its Noncommodity Emphasis (Alternative F) as its management plan for the Gila.

231-1

The demand for domestic livestock grazing was estimated by considering historic trends in grazing use of the Forest. We do not have any method of quantifying the effect of the situation you describe.

231-2

We agree. The projection of demand in the Plan was based on the type of information that you mentioned. With the recreation capacity of the Forest, there should be no problem meeting future demand for wild and wilderness type recreation.

231-3

We have re-evaluated our recommendation on the wilderness study areas and the potential wild and scenic rivers and feel that the recommendations in the Proposed Action Alternative are still appropriate. The rationale for our recommendations are included in the Proposed Action Alternative Summary of Change located in the front of the public comment document.

231-4

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 42 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. As a result of 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 for more information concerning the modified timber program. We feel that these changes will result in the balanced use of forest resources.

231-5

Because of changes in the Proposed Action Alternative, the development of unroaded has been reduced. 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. The development affects on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Change.

231-6

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. Refer to the response to your comment number one, for a discussion of the Wilderness Study Area recommendation.

¹ Nonconcordly Emphasis (Alternative F). This alternative emphasizes resource outputs with nonmarket values (i.e. wildlife, dispersed and developed recreation, quality of wilderness experience, watershed condition, and other amenity values). Range permitted animal unit months are expected to decline to 338,000 during the first 10 years and to be at 289,000 by the end of 50 years. This decline is a result of not being able to replace existing range improvements, the need to get permitted numbers equal to forage capacity, and the need for forage for increased wildlife numbers. Timber harvest is expected to average approximately 14 million board feet during the first 10 years and remain at approximately 25 million board feet for the remainder of the first 50 years. Implementation of this alternative will require construction and reconstruction of an average of approximately 10 miles of roads per year in the first 10 years increasing to approximately 12 miles by 2035. Unless the roads are needed for management or to make emphasized resources available, the roads will be closed. Fuelwood harvest would be expected to increase from approximately 6 million board feet (12,000 cords) during the first 10 years to approximately 9 million board feet (18,000 cords) by 2035. This alternative will be adequate to insure a moderate to high recreation experience for dispersed, developed, wilderness recreation users. Developed recreation use is expected to increase from 171,000 recreation visitor days annually in the first 10 years to 191,000 recreation visitor days annually by 2035. Dispersed and Wilderness facilities would be maintained. Wilderness study areas would be recommended for wilderness designation. Both rivers are recommended for inclusion into the Wild and Scenic River System. A substantial overall improvement in existing wildlife habitat carrying capacity will occur by 2035. Wildlife associated recreation is expected to increase from an average of 422,000 recreation visitor days during the first 10 years to 691,000 recreation visitor days by 2035. "

In addition, the Forest Service should make the following items a part of Alternative F

1. The Forest Service should intensify its effort to identify, protect and encourage the multiplication by proper practices, all endangered species (both plant and animal) known and yet to be identified in the Gila. The Cactus and Rock Club is particularly concerned about cacti and other succulent plants. All cacti are considered endangered or threatened by the International Convention.
2. The maintenance of trails should receive increased attention and particular attention should be given to the preservation of the scenic quality of that portion of the Gila through which the Continental Divide Trail will pass.
3. The following areas should be managed as roadless and undeveloped areas for semi-private, non-motorized recreation and to retain their value for ecological study, wildlife habitat, and watershed protection:
 - a. Areas along the Mogollon Rim stretching from the Blue Range to the Gila Wilderness (125,855 acres),
 - b. Freestanding wilderness candidate areas, such as Frisco Box (40,050 acres) and Eagle Peak (30,380 acres), and
 - c. Areas adjacent to the Aldo Leopold Wilderness (170,160) to extend the wilderness characteristics of this magnificent wilderness resource.

The above comments and recommendations were presented to and studied by the members of The El Paso Cactus and Rock Club at their regular meeting held Sept. 7, 1985. Almost all members present are in agreement and recommend Alternative F as the only desirable plan for managing the Gila Forest in the years ahead. Eighteen members, including myself, have signed copies of this letter of recommendations and have added comments of their own. These letters are included in this packet.

Sincerely,
John W. Green
 John W. Green, Conservation Chairman F

231-7

We will continue to work toward the recovery and delisting of all threatened and endangered species.

231-8

We agree that the maintenance of trails should receive increased attention. Trail maintenance in the original Proposed Action Alternative has been increased above current levels. In the modified Proposed Action Alternative trail maintenance has been increased further to a level 266 percent higher than the 1984 trail maintenance budget. This should result in upgrading about 75 percent of the substandard trails to prescribed levels.

Where the Continental Divide Scenic Trail corridor occurs within wilderness the visual quality objective will be 'preservation'. Where the Continental Divide Scenic Trail occurs in non-wilderness areas it will have a visual quality objective of 'partial retention'. This will provide for adequate protection for visual quality in the event the final location is within the tentatively selected corridor.

231-9

As mentioned in response to an earlier comment, the development of unroaded areas has been reduced in the modified Proposed Action Alternative. The effects on individual areas is displayed in the Proposed Action Alternative Summary of Change.

000232

September 4, 1985

Gila Forest Service
Regional Office

To Whom It May Concern

I am writing to comment on the Gila National Forest Master Plan. I feel very strongly that the main concern in considering long range planning for the Gila should be its preservation as a wildlife and wilderness area.

I had the privilege of backpacking there last summer. It is a beautiful area--a very special feeling to walk among tall aspens and pines, to spot deer and other wildlife as you hike, to sense truly being part of nature. It gives one peace and an appreciation of the environment and the interrelation of animals, plants and man. This to me is a far greater resource than how many trees can be cut for timber or how many minerals can be dug from the earth. Once the wilderness is lost, there is no replacement or alternative substitute, as there may be for fuel and building materials.

I support Alternative F which stresses "wildlife habitat, wildlife recreation use, wilderness, wild and scenic rivers and watershed." I agree with Silver City Mayor Steve May that he can't see commercializing the Gila. What legacy will we have to leave future generations if we continue to hack away at what few wilderness areas there are left?

Thank you for your consideration.

Sincerely,
Silva John
2165 S. Laramie Ave.
Flagstaff, AZ 86106

232-1

As a result of changes made to the Proposed Action Alternative, there will be less development of presently undeveloped areas. Classified Wilderness areas are protected by law and will not be developed.

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. The development effects on specific unroaded areas are displayed in the Proposed Action Alternative Summary of Changes located in the front of the public comment document.

232-2

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 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 more net public benefits than Alternative F.

LETTER 233

FOREST SERVICE RESPONSE TO LETTER 233

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22. Notes

1 General Public Lands

Good Filled Land

TABLE 1

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LETTER 234

FOREST SERVICE RESPONSE TO LETTER 234

000234

Charles Rarick
1617 Monte Largo N.E.
Albuquerque, New Mexico 87112

August 26, 1985

Mr. Kenneth Skoggin
Gila Forest Supervisor
2610 North Silver Street
Silver City, New Mexico 88061

Mr. Skoggin:

It is immensely important that a Gila National Forest Master Plan be adopted that will provide for the greatest possible amount of wilderness preservation. Without question, the San Francisco River canyon should become a federally designated wilderness.

As a native New Mexican who has travelled to nearly every other state in the Union, it is clear to me how fortunate I am to live in one of the few states that still contains relatively unspoiled wilderness areas. It is also clear to me that we all have the responsibility to preserve what we can, as quickly as we can, to prevent New Mexico from losing this precious resource forever. The forests and plains of our state contain an ever-increasing maze of roads--enough to keep the most enthusiastic four-wheeler occupied indefinitely. There is little true wilderness left, however; few places large and remote enough to allow those who seek solitude from the noisy, busy world to find it.

Typically, wilderness areas are composed of lush forests and alpine meadows. There is another type of wilderness--the arid, rugged terrain so typical of New Mexico--which is an equally important part of our heritage. The San Francisco River canyon is a beautiful and important example of this other kind of wilderness.

For ourselves, our children, and the future of New Mexico, I urge you to adopt Alternative F and preserve the magnificence of the Gila Forest.

Sincerely,

Charles Rarick
Charles Rarick

FOR RECORD
8/28/85

AUG 28 1985

DATE RECEIVED

234-1

In response to public comments the level of timber harvest and the level of road construction has been reduced in the modified Proposed Action Alternative. Please read the Proposed Action Alternative Summary of Changes located in the front of the public comment document for a description of these changes.

Throughout your comment you mention the need to preserve undeveloped areas. We feel that the modified Proposed Action Alternative responds very favorably to this concern. Even though the wilderness study areas on the forest are not recommended for wilderness, much of the unroaded area on the Forest will be managed to maintain semi-primitive recreation opportunities. By the end of the first decade, approximately 45 percent of the Forest would still remain unroaded (includes wilderness and unroaded areas). Even if the plan is projected for 50 years, 44 percent of the Forest would be expected to be undeveloped. Many arid areas of rugged terrain are included within these undeveloped areas.

234-2

We feel that as a result of the changes made to the Proposed Action Alternative it provided for balanced use of the Forest's resources. 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 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 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 net public benefits than Alternative F.

JAN 27 1975

000235

AMF 27/75

WFS 05/5/75

9/23/75

Dear Supervisor,

As you know, the Forest Service revised a draft management plan for the Gila National Forest in June 1975. As drafted, the plan calls for a large increase in timber harvests over four decades and a massive road building program. Over the next five years, the Gila's timber sale program had over \$2.5 million. Is it really necessary to expand our forest further in an attempt to increase timber harvest? The Forest Service plan to build about 1,500 miles of new road necessary for the logging effort would be very harmful to the Gila's steep and easily eroded terrain.

235-1

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 1,450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads. This is a 57% 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. A more complete discussion of the changes in the Proposed Action Alternative can be found in the Proposed Action Alternative Summary of Change located in the front of the public response document.

Even though changes have been made as a result of public concern, it is important to point out that 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 firewood 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 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.

My family and I support protection
of roadless lands in the best
and highest use of forests.

We would like to take this
opportunity to inform you that we
support wilderness designation for
the Lower San Francisco Canyon and
Hells Hole. In addition, the
following areas should be managed
as roadless and undeveloped:
area along the Mogollon Rim
stretching from the Blue Range to
the Gila Wilderness, including
wilderness candidate areas such as
Travis Box and Eagle Peak, area
adjacent to Aldo Leopold Wilderness.

Thank you,

Joseph Buckler
Joan Zucker

235-2

As a result of changes made to the Proposed Action, the development effects on unroaded areas have also been reduced. 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 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. The effects on the modified Proposed Action on specific unroaded areas is displayed in the Proposed Action Alternative Summary of Changes.

235-3

We re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that it is still appropriate. The rationale for this recommendation is in the Proposed Action Alternative Summary of Changes.

235-4

Please refer to response 235-2 for a discussion of the proposed management for the undeveloped acres outside of the classified wilderness.

LETTER 236

FOREST SERVICE RESPONSE TO LETTER 236

236-1

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 1,450 miles of roads over 50 years. The modified Proposed Action Alternative projects construction of approximately 630 miles of roads. This is a 57% 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 sixty-five percent of these roads would be closed after timber activities are completed. (For a more complete summary of the changes in the Proposed Action Alternative, read the Proposed Action Alternative Summary of Change located in front of the public comment document.

236-2

Off-road vehicles are not permitted in any of the classified wilderness areas on the Forest. In the portions of the Forest that are not closed to ORV use, ORV use is recognized as a legitimate form of recreational experience. ORV use has not been heavy on the Forest and has generally not been concentrated. As a result, significant resource damage is not occurring. The Plan addresses the ORV issue by permitting use to occur as long as it does not result in resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORVs.

236-3

Our non-wilderness recommendation for the two wilderness study areas was re-evaluated between the Draft and Final Plan. We continue to feel that the non-wilderness recommendation is appropriate. Please see the Proposed Action Alternative Summary of Changes for the rationale for this recommendation.

236-4

Changes in the Proposed Action Alternative have resulted in less development impact on the Forest's unroaded areas. Of the approximately 688,000 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. A list of the effects on specific areas can be found in the Proposed Action Alternative Summary of Change.

000236

August 23

Forest Supervisor
Gila National Forest
2610 North Silver St
Silver City NM 88061

Dear Sir;

As residents and taxpayers we must strongly protest the provisions of your draft management plan for the Gila. It is one of the last large unprotected wilderness areas in the Southwest and putting in roads will degrade it. There is little demand for timber these days and to harvest it at a net cost to the taxpayer is really bad. It would also be a crime to permit off the road vehicles--this wilderness area is a precious heritage for our children and their children.

We support wilderness designation for both the Lower San Francisco Canyon and Hells Hole. We strongly recommend that the following areas be reserved for no development, roads or vehicles along the Mogollon Rim from the Blue Range to the Gila Wilderness, freestanding wilderness areas such as Eagle Peak and Arisco Lo., and the areas adjacent to the Aldo Leopold Wilderness.

I am sure that you realize that once these rare areas are degraded they are lost forever. We hope that you will make every effort to preserve them.

Very Sincerely

John V. Noel Capt in USN (ret)

1014 S. Houghton St Santa Fe NM 87501

LETTER 237

FOREST SERVICE RESPONSE TO LETTER 237

W. J. Hassell, Regional Forester
Gila National Forest
2610 N. Silver City, New Mexico
88001

4/22/85
Date

4/22/85

000237

DATE RECEIVED

6/16/85

Mr. & Mrs. R. J. Melancon
1800 Manchester
Lubbock, TX 79403

Dear Sir:

Upon reading and discussing the proposed plan for the Gila National Forest dated March 4, 1985 by Busland and I would like to voice our preference and hope that other people who feel the same way will also speak up. We would like to see provisions come into effect for the following reasons:

We would like to see the amount of timbering decrease greatly in spruce, aspen, and fir trees not only because of the aesthetic beauty, but because we are concerned for our watersheds. As you know those trees, some of them, are three and four hundred years old and older, if cut down they will not reach present stature for many generations to come. Can we afford to leave our forests virtually unprotected for so long?

In order to offset expenses why not charge for lakeside camping as well as the use of the lake itself.

The running of livestock, as our as beneficiaries and that program could even be expanded.

The forest as it stands in its undisturbed state is like stepping into a page of history with all its natural beauty and we would like to see it remain.

Sincerely,

R. J. Melancon
R. J. Melancon
Mr. & Mrs. R. J. Melancon

237

237-1

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 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 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 net public benefits than Alternative F.

237-2

As a result of public comment, the projected annual timber harvest has been reduced from 35 MMbf to 30 MMbf during the first decade. This harvest level is projected to remain constant throughout time. This reduction results in a 20% reduction in road construction in the first decade and a 57% reduction in road construction through the fifth decade. This timber harvest program will not result in significant degradation of visual quality. No harvest of aspen is planned. Only approximately 20 percent of the harvest volume is expected from fir stands. Many of the spruce fir areas that you mention would not be logged for at least 10 years.

237-3

We do not have the authority to initiate a general user fee for National Forest lands. Congress would have to pass a law authorizing user fees before the Forest Service could collect such a fee. We can only charge for the use of full service campgrounds.

237-4

Within the budget constraints of the Plan there is insufficient funding to sustain an increased grazing program.

000238

512 Turner NE
Albuquerque, NM 87123
August 16, 1985

Kenneth C. Scoggin, Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

GILA NATIONAL FOREST
Silver City, NM

AUG 20 '85


DATE RECEIVED

Dear Mr. Scoggin:

Thank you for the opportunity to comment on the Proposed Gila National Forest Plan. My family and I have visited the Gila many times during our 23 years in New Mexico. It is one of my favorite places. We enjoy the Gila most for backpacking, fishing and hunting. Two activities which bother me most in wilderness like environments are overgrazing by livestock and ORV abuse. I have seen both greatly abused. Several years ago and repeated over a period of years I have seen overgrazing abuse in Circle 7, Morgan and Rattlesnake Canyons in the Black Range. The results are ugly and greatly decrease the value of the land for recreation purposes and wildlife habitat. I would like to see livestock grazing totally eliminated from national forests but especially from all wilderness areas. Off the road vehicles are nuisances because their noise and appearance detract from the peace and quiet normally associated with mountain environments. They also damage the environment. I would like to see vehicle usage confined to established roads only in all national forests.

Because of our values and the way we enjoy the Gila, Alternative F is by far our favored management plan for the Gila.

Sincerely,



Ronald Madsen

238

238-1

We share your concern in regard to range management problems. In the past few years management has resulted in improvement of the range resource but some problems still occur. In the Proposed Action Alternative, livestock numbers are brought in line with capacity by both 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 conditions 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.

238-2

ORV use is recognized as a form of recreational experience. This type of use has not been heavy in most portions of the Forest. As a result, the type of problems that you mention have been few. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

238-3

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 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 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 net public benefits than Alternative F.

LETTER 239

**phelps
dodge**
Corporation Tyrone Branch, Tyrone, New Mexico 86065 • (505) 536-5331

August 13, 1985

000239

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

Dear Mr. Scoggin:

Phelps Dodge Corporation presents the following comments on the proposed Gila National Forest Plan ("Plan") and Draft Environmental Impact Statement ("EIS") dated May, 1985.

We support the proposed decision to recommend that the two wilderness study areas, Lower San Francisco River and Hell's Hole, not be designated as wilderness. This is justified by the finding that the existing Gila, Aldo Leopold and the Blue Range Wilderness Areas more than satisfy the demand for wilderness use in the Gila National Forest. (Plan, p. 10.) We also support the proposed action to continue the current status of the San Francisco and Gila Rivers and not to recommend the inclusion of those rivers in the Wild and Scenic Rivers System.

We have some concern about the philosophy toward mineral development reflected in certain parts of the Plan and EIS. An appropriate statement is made on page 22 of the Plan that the management direction will be to administer the mineral laws and regulations to minimize surface resource impacts while supporting sound energy and minerals exploration and development. However, on page 11 of the Plan the following statement is made:

"The removal of minerals, energy resources, and common variety material impacts the natural environment and results in conflicts with other resource protection, uses and activities."

The same statement is made on page 79 of the Draft EIS. Although these statements may, in some situations, be correct, the discussion does not acknowledge the offsetting benefits of mineral production from the national forests providing employment and furnishing the minerals needed in the United States economy and for defense. To be accurate, those discussions should include acknowledgement of these offsetting benefits.

On page 114 of the Draft EIS, it is stated that "mining" claims are contested where detrimental surface disturbance is occurring, or where claims are suspected of being invalid." Also, with reference to particular management areas, it is stated on pages 112 and 119 of the Plan that "soil disturbance by mining activities will be prohibited or restricted as needed to maintain soil stability on the datil and rhyolitic soils." These statements indicate a misunderstanding of the policy and law applying to mineral exploration and development in national forests. We are aware of no policy requiring that mining claims be contested where detrimental surface disturbance is occurring. The very nature of mineral exploration, and particularly of mineral development, requires some surface disturbance; and it is sometimes impossible or impracticable to maintain soil stability at the site of a mining operation. These standards of reasonableness, practicability and minimization (not prohibition) of surface resource disturbance are clearly set forth in 36 C.F.R. Part 228 and should be incorporated in the EIS and the Plan.

239-1

We have rewritten the section of the EIS that you describe and have included the information that you suggested.

239-2

Thank you for bringing this error to our attention. It has been corrected in the Final Environmental and Final Plan.

We commend the Plan and EIS for including a review of certain withdrawals and proposing to recommend the revocation of some (EIS, p 114, Plan, pp 46, 49) However, this review was limited to the 28,600 acres of administrative withdrawals which had been made at the request of the Forest Service and excluded review of 78,700 acres created at the request of other federal agencies and the 790,000 acres of legislatively withdrawn wilderness. It is stated on page 114 of the EIS that "since the wilderness acres are closed by the 1964 Wilderness Act, no further discussion of these acres will be made in this section." The Forest Service planning regulations require that reasonable alternatives which may require a change in existing law or policy to implement shall be formulated if necessary to address a major public issue, management concern or resource opportunity. Therefore, a reduction of wilderness requiring a change in existing law or the revocation of other withdrawals requiring a change in policy of the Forest Service or other federal agencies should not preclude these alternatives from being considered. (36 C.F.R. § 219.12(f)(5)) This is particularly true with respect to wilderness because of the finding that the supply of wilderness in the Gila National Forest exceeds the need (Plan, p 10)

It appears from pages 80 and 114 of the EIS that, including withdrawal revocations and additions, there is proposed to be a net reduction of approximately 6,600 acres of land within the Gila National Forest withdrawn at the request of the Forest Service. However, this also appears to include approximately 2,500 acres of new land withdrawals. We have been unable to find in the Plan or EIS an identification of the lands which would be included in these new withdrawals. We would appreciate being furnished with that information and to submit additional comments, if appropriate, at a later time.

Pacific Western Land Company (PWLC) is a wholly owned subsidiary of Phelps Dodge Corporation. PWLC'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.

The Draft Environmental Impact Statement is a public document designed to communicate with and inform interested citizens of the Plan for the Gila National Forest. The extensive use of acronyms has indeed categorized the current Statement as a coded document with code supplied for deciphering by individuals who wish to know the contents.

Some terminology is not defined. A term used extensively in charts and text is the word "period." The glossary does not define the time frame for a Forest Service "period."

The FORPLAN computer system facilitates the use of tables for comparative purposes, so tables are used to overwhelm the reader. Some of the tables are informative, but others are meaningless. Some statements approach the absurd--(i.e. p.113, water yield) "currently the Gila National Forest produces an estimated average annual water yield of 337,963 acre feet. A majority of the water produced is from the ponderosa pine and mixed conifer vegetative types."

The Draft Environmental Impact Statement Proposed Gila National Forest Plan does not exhibit the same clarity as comparative documents recently published by the Bureau of Land Management.

Thank you for this opportunity to comment on the Draft Environmental Impact Statement and Proposed Gila National Forest Plan.

Very truly yours,

Richard E. Rhoades
Richard E. Rhoades

239-3

The withdrawals of other agencies must be reviewed by those agencies, as we do not have authority to review these withdrawals.

239-4

We agree that the regulations require the Forest Service to review a reasonable range of alternatives. We also agree that we can consider alternatives which may require a change in existing law or policy to implement, if necessary, to address a major public issue, management concern, or resource opportunity. We considered this direction and concluded that there was no point in evaluating an alternative that proposed changes to the wilderness boundaries. No major issue relating to changing the wilderness boundaries was identified during the issue identification phase of the planning process. If congress concluded that significant resource opportunities were lost as a result of the wilderness classification, it is our opinion that they would have addressed this in 1980 when the New Mexico Wilderness Act was passed.

239-5

The addition that you question is the lands not currently withdrawn that are within the Highway 15 corridor to the Gila Cliff Dwellings. The corridor includes all National Forest System lands between the Gila Wilderness Boundaries along Highway 15. The Acreage is not shown but the area of the withdrawal is covered on pages 171 and 250 of the draft Forest Plan.

239-6

The reduction shown for the management area containing your allotment is an estimate based on the best data that we have available. No cuts or increases will be made as a result of the Forest Plan. The Forest Plan sets the emphasis levels for the various resources and indicates where we will be investing scarce funding. The capacity and permitted numbers that can be maintained within the investment limitations and the resource tradeoffs will be determined using standard allotment analysis procedures.

239-7

The definition for the term "time period" has been added to the glossary.

239-8

Thank you for your comment. We are dealing with very strict regulations on what has to be displayed in the Environmental Impact Statement. We are sorry that the documents are not clear to you and we will try to improve the clarity in the final Forest Plan.

LETTER 240

Post Office Box 1
Fort Verde, Ariz.
10 August 1975

Mr. J. L. G. G. G.
Mr. J. L. G. G. G.
211 North Silver Street
Silver City, New Mexico 88061

000-13

Dear Mr. G. G. G.

May I comment upon the Gila National Forest Proposed Plan. I see a national shift in the consciousness of our nation, and indeed world, as we near A.D. 2000. As the forest cover of the world diminishes, and habitat destruction continues to accelerate, the timber will become more and more important to the survival of the human race as a store of the global gene pool, the biological diversity of life.

The use of the forest by special interests for lumbering, and forest development, will pale beside the need to protect remnants of the original life that nurtured mankind, and to our eyes, a stable ecological zone like the Gila National Forest. In Green Inheritance states "Although modern nations are based on the exploitation of plants and plant products, the future health of those economies nevertheless depends on preservation of extensive natural areas. It is in these areas the diversity of our natural inheritance must be stored."

The Gila National Forest will be seen as one of the most valuable natural resources in North America, because of the diversity of its wilderness, but also because of the large buffer zone forest and the wilderness. To see the area outside the wilderness as a wood-fiber resource that needs management is to neglect its holistic value. The Gila is a life-island large enough for species to continue evolution unimpinged by humanity.

There are two Forest Service Plans as a short-sighted response to the local economy, that will be seen in retrospect as doing little to improve diversity. The logging of steep slope areas and the alternative, the livestock production increase, the building of major roadbuilding, will degrade the overall ecology of the Gila National Forest.

It is time that we should be able to do more in further habitat protection. The area protected within wilderness is a life-preservative, an original part of our world. Only by a more unified and more coordinated plan, and a more unified plan, can we protect the Gila National Forest.

Sincerely,

Stan Ro -

240-1

In response to public concerns, several changes have been made to the Proposed Action Alternative. Timber harvest has been reduced, road construction has been reduced, and the development effects on existing unroaded areas of the Forest have been reduced. The Plan continues to prescribe some steep slope logging since the logging of some of the steep slope portions of the Forest helps meet our desired level of timber production while minimizing acres logged and road construction. As in the original Plan, livestock permitted numbers are expected to decrease by approximately 10%. We feel that with the changes in the Proposed Action Alternative, it provides for balanced use of the Forest's resources while maintaining 87% of the existing unroaded area for semi-primitive recreation. A more complete summary of the changes in the Proposed Action Alternative is included in the Proposed Action Alternative Summary of Changes located in front of the public response document.

You also stated that you prefer Alternative F. 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 does the best at addressing the some of 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 more net public benefits than Alternative F.

LETTER 241

FOREST SERVICE RESPONSE TO LETTER 241

DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT CORPS OF ENGINEERS
P O BOX 1580
ALBUQUERQUE, NEW MEXICO 87103-1580

August 6, 1985

Engineering and Planning Division
Planning Branch

000241

Mr Kenneth C Scoggin
Gila National Forest Supervisor
2610 North Silver Street
Silver City, New Mexico 86061

Dear Mr Scoggin

The Forest Service's Draft Environmental Impact Statement for the Proposed Gila National Forest Plan has been reviewed in relation to the Albuquerque District's responsibilities for flood control and administration of Section 404 of the Clean Water Act.

Those alternatives that emphasize watershed reforestation would contribute toward the reduction of flood hazards, stabilization of stream channels, improved water quality and yield, and increased longevity and effectiveness of any downstream flood control structures. The proposed action alternative appears to make such contributions while simultaneously providing a combination of harmonious but diverse resource uses and considerations.

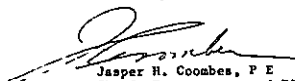
Discharges of dredged or fill material into waters of the United States are regulated under Section 404 of the Clean Water Act (33 CFR 320-330). Certain types of activities described in the Land and Resource Management Plan could involve the discharge of dredged or fill material into waterways, for example, recreational road construction, timber harvesting roads, roads and drillpads for oil and gas exploration, and mineral mining. Regulations at 33 CFR 323.4 describe an exemption for construction or maintenance of temporary roads for moving mining equipment provided certain best management practices are satisfied. Those activities which do not involve mining may be permitted under several nationwide permits described at 33 CFR 330.5 if the nationwide permit conditions can be met.

A brochure describing the Corps' regulatory program and summaries of nationwide permits for work in certain waters, minor road crossings, work involving less than 10 cubic yards, work on existing fills, bank stabilization and utility lines are enclosed for your information. If any proposed project cannot be performed under authority of a nationwide permit, an individual permit may

be required. Several streams in New Mexico have been closed to mechanized recreational prospecting due to the high quality nature of the fishery. These streams are listed in the enclosed regional permit number NM-OYT-0315A. Additional information regarding the Corps regulatory program, determinations, and maps showing headwater locations may be obtained from Ms Jean Manger or Mr Andrew Rosenau at (505) 766-2776.

Overall the Draft Environmental Impact Statement appears to be well prepared and the opportunity to review it is appreciated.

Sincerely,



Jasper H. Coombes, P E
Chief, Engineering and Planning Division

- 3 Enclosures
1. Brochure
2. Nationwide Permit Summaries
3. Regional Permit No NM-OYT-0315A

241-1

Thank you for your comment and information. It is our intent that any project initiated as a result of this Plan comply with all applicable laws, rules, and regulations.

Gila Nat'l Forest

0013 David C.
El Paso, TX 79925

To whom it may concern

July 20, 1985

I am writing in regard to the proposed plan and draft environmental impact statement that the Gila Forest has been scrutinized under, that came out this past May. I unequivocally favor Alternative F, which stresses amenity resources, I will explain my reasoning in the following paragraphs.

First, it is only fair that I inform you that I am an avid backpacker, and that in the Gila I have backpacked near Whitewater Creek, the Mogollon Mountains, to the black Range. In another context, I've done such trips from Montana to Mexico. I've also had two friends, one with the park service and the other with the forest service who have worked in the Gila.

The Gila is one of the best wilderness areas in the United States. If I'm not mistaken it was the first forest set aside by the US (1924?). The Gila is undoubtedly the best wilderness area in the Southwest. Of course, many different aspects of its character go into defining best. But basically, it boils down to the wilderness character of the area (remember wilderness essentially means the place of the beasts).

As you see, the most unique and outstanding character of the Gila is its wilderness character. Once this character is lost, it cannot be replaced for hundreds of years at best. There is so little wilderness left in the United States (official wilderness areas comprise less than 2% of the land mass) that I feel that any place left that does have that quality left to it should be saved from the onslaught of civilization; little islands of sanctuary in a world of unrest. As Aldo Leopold said it so good once, "There are some who can live without wild things, and some who cannot." You all would do well to follow his example, of which the Gila is a part of it.

242-1

The Gila National Forest accommodates several different types of users and they are involved in all kinds of activities, one of which is backpacking. Other users also demand the Gila be set aside primarily for their use or activity. The Forest Plan attempts to blend the uses and activities on the National Forest to address the issues and management concerns identified in the planning process.

I also know the Gila has valuable timber and grazing resources but I feel that there we should be at an absolute minimum. First, the resources are finite in the end, and though the Gila may be a good yield of timber for instance for the next 80 years, the timber will slowly be exhausted. The timber industry needs to put more effort into tree farms and such rather than relying on wild sources for their pocketbooks. This just makes them work a little harder at it now rather than postponing their doing it after they've cut down much of the wild lands. Nothing is more disconcerting than walking through a "forest", obviously cut decades before, where you can't find a ponderosa pine over 100 years old, watching the phor grapple each other in thick stands with all kinds of ~~brush~~ brush choking the clearings. It's far worse than the damage I certainly hope the Gila National Forest doesn't follow the example of the Carson Forest, where they are proposing to cut about 40% of the timber in the next few years, or say the Indian Mounds wilderness in east Texas, where I see them cutting down trees in a designated wilderness area (even hardwoods) to "stop" pine beetle infestation (only to spread it more by their carelessness). Some of these forests that the Forest Service runs are undoubtedly the "land of many abuses".

Also, there is the issue of grazing. Do you understand the impact of cows (and sheep) on the land. They really can do a good job of clearing up the countryside with their hooves, particularly during the spring, and also they can easily get to proportions where they are overgrazing and displacing the native vegetation.

I know I sound unduly harsh, but I've seen a lot of mismanagement, and I've known more than one national forest to heavily cut timber in an area, then use the cleared land for grazing, while making a nice handsome profit at it.

242-2

In response to public concerns, the level of timber harvest in the Plan 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 propose 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 14 years and is 45% below the allowable sale quantity level in our existing timber management plan.

242-3

In your comment you state that if timber is harvested, the timber supply will be exhausted. By law National Forests are managed on a sustained yield basis. Timber will not be harvested at a rate that exceeds the long-term sustained yield capacity. Stands will be regenerated at the appropriate time in the management cycle and managed to provide timber indefinitely.

242-4

The National Forest operates under a policy of multiple use and sustained yield. Livestock grazing is authorized as one of the multiple uses along with timber, recreation, wildlife, wilderness, and watershed activities. Livestock use on the National Forest is regulated to limit livestock forage consumption and analyzed to determine its compatibility with other resources. We understand and appreciate cases where mismanagement has caused people concerns. We also recognize the benefits from good livestock management. The Gila National Forest currently permits 383,000 AUM's of grazing, and through time this number is projected to decline to 350,000 AUM's. At the proposed level, we feel that livestock grazing will be in balance with other uses and activities and that the range resource will continue to improve.

I'm sure by now you think I'm a cynic, anti-growth, anti-progress, etc. I'm just telling what I've seen. I like to think myself as pro-growth, pro-wilderness, etc. You see, the Gila is a special place. I saw my first bald eagle, my first peregrine falcon, etc. in the Gila. When I was 14, I had my first wilderness experiences in the Gila. In fact, I grew in many ways in the Gila; I have special memories that I will always treasure, and new ones awaiting me there and other such places. I hope future generations will have those opportunities too. It saddens me to no end to watch these beautiful places being slowly whittled away for their material resources, while their greatest resource, the spiritual resource, is ignored and trampled.

Again, I have no particular sympathy for the timber industry or the livestock one. There is enough developed (over-thinned) land for them to do their business, without burdening the wild places. I would like to see the least development possible in the Gila National Forest. The forest's greatest asset is its recreational one (and I don't mean roads all over the place to gaze at the mountains from your air-conditioned car).

I hope you come up with a even more restrictive alternative on development. The Gila should be preserved, the watersheds protected. The rivers should be classified in the wild and scenic rivers system. Oil drilling, timber cutting, grazing and mining should be kept at a minimum. Please put the Bullhole and the Lower San Francisco River into the wilderness system. There are more places that deserve this classification (RARE II was your best).

You may think I'm eccentric, I am who I am, and this is how I feel about the Gila. In the preceding paragraphs I hope you don't totally ignore my opinions. I'm just one of those men who likes to spend a lot of time in the mountains when he gets the chance. Grace and peace be to you. Take it easy.

Sincerely,
Robert [Signature]

5
GJF
LJA

242-5

We have made several changes to the Proposed Action Alternative in response to the many concerns that were expressed regarding logging, road building, and the effects of these activities on unroaded areas. These changes are explained in the Proposed Action Alternative Summary of Change located in the front of the public comment document. We feel that these changes provide a well balanced alternative.

In your comment you also mention wilderness study areas and wild and scenic river classifications. We have re-evaluated our recommendation on wild and scenic classifications and on the wilderness study areas and feel that the original recommendation on these areas is appropriate. Our rationale for the recommendations is included in the Proposed Action Alternative Summary of Change.



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS TEXAS 75242

000243

JUL 05 1986
GILANE

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

Dear Mr. Scoggin:

Thank you for allowing us the opportunity to review the draft planning documents for the Gila National Forest New Mexico.

We continue to express our support of the Forest Service in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently several Air Force air operations including instrument flight training routes SR 210, 211, VR 176, and VR 1233 traverse a portion of the study in question. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future. However, if we do propose any change we will keep you informed.

Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 767-2527, or FTS 729-2527.

Sincerely,

EDWARD LOPEZ, Chief
Planning and Intergovernmental Affairs Branch

CY to HQ USAF/LEEW

243

Thank you for your comment. We do not feel the Proposed Plan will in any way affect any existing flight training areas. As in the past, future needs will be evaluated and handled through our normal process.

FOREST SERVICE RESPONSE TO LETTER 244

In response to public comments, the projected timber harvest level in the Plan has been reduced. Please read the Proposed Action Alternative Summary of Change (located in front of the public response document) for a description of the change in the timber output.

244-2

We have re-evaluated our non-wilderness recommendation for the two wilderness study areas and feel that the recommendation is still appropriate. Our rationale for the recommendation is included in the Proposed Action Alternative Summary of Change.

Dec. 5.

Below are my comments on the DEIS
and the proposed plan.

I would like to see the Proposed Action (PA) modified to allow the timber and forwood yield, and I would like to see it held out low so future cost of timber and forwoodness, and it is a good congressional document, such

Donald H. Hartman

000245

To whom it may Concern:

After reading the Environmental Impact Statement for the Gila National Forest proposed plan & the accompanying material I find it very clear & informative. Agree with most of it.

The only concern I can find that would somewhat need further study is the use of 3 wheel or off road vehicles. We saw how the desert areas of Utah and the mountain areas of the South East were affected by this form of activity. It tended to spoil the landscape, scare the wild life & make it unsightly for others. In agreeing to permit this type of activity in the future I ask that you please inquire if other states their permitting so our areas are not affected in this way.

Thank you

Elizabetha Padden

245

245-1

ORV use is recognized as a form of recreational experience. Historically, use on the Forest has been low and has generally not been concentrated in specific areas. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

000246

As a response to the management and draft environmental impact statement prepared for the Gila National Forest released in conjunction with a press conference Friday, June 7, 1985, and subsequent news release, I wish to say

It is my opinion that two things be re-evaluated the animal unit month figure, and all multiple use impact upon the Wilderness] 1

The impact of cattle upon the land, especially in Wilderness areas, is best determined through visual inspection. It is my experience that there is major impact in two ways the reduction of foliage/erosion increase, and the deposition of feces. The animals impact is most severe along the Wilderness/National Forest boundary.

I suggest that either the range of the animal be backed up to the Wilderness boundary, or the law be changed to exclude cattle from Wilderness lands. The goal is to exclude grazing permits from Wilderness use. The strategic goal is to create a management system where only Primitive areas and National Forest exist as definitions of use.] 2

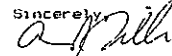
In effect, what I am saying, is that the Primitive areas be expanded into what is now designated Wilderness and that the cattle permits be unavailable in Primitive areas. Thereby, the current National Forest boundary be left as is while the Wilderness areas are re-designated PRIMITIVE and all Primitive areas be non-multiple use areas.]

I encourage the increase of fines for litter and destruction] 3

I encourage the visits of man to the present primitive and Wilderness areas as this essence of creation tends to inspire communication with God.

Respect and care are high level words. It is each person's responsibility to have that compassion in some part of his or her life. Our preservation of our natural lands bespeaks respect and care as a social body.

In closing, let me say again the animal unit month figure needs to be re-evaluated.

Sincerely,

Anthony J. Trill

246-1

Although you indicate the animal unit month figure needs to be re-evaluated, we are not certain as to what your concern is. The animal unit month figures used in the Plan were derived on the basis on the Forest potential for producing forage. Research has determined the average amount a grown animal will consume per month. In addition, research has determined how much sustained use various plant communities can tolerate before vigor and species composition is affected. The forage in excess of that needed to maintain the plant community is available for consumptive use. This figure divided by the average consumption per animal per month establishes the capacity of a given area in animal unit months. The resulting animal unit month figure is then allocated to the various consumptive user groups: livestock, game animals, non-game animals, etc..

246-2

The changes that you suggest are outside of the scope of the Plan. Where established before the passage of the Wilderness Act, grazing is recognized as a legitimate use in the wilderness. Congress would have to change the law in order to change this situation. It would also take congressional action to make the classification change that you suggest.

246-3

The fines for littering are established through the court system. Changing the fines is outside the scope of the Plan.

LETTER 247

FOREST SERVICE RESPONSE TO LETTER 247

247-1

Thank you for your comment. For the comments that address your concerns, please refer to the responses to the comments in letter 002.

000247
STEVE and MARCIA STULTS
6199 Los Robles Drive, Carlsbad, California 92008
10-17-85

Dear Sirs,

I am writing to add my strong support to the Earth First! plan for a 13 million acre Bala wilderness in the Bala National Forest. I will not reiterate their 11-point plan, as I am sure you possess a draft of their recommendations. Please support these proposals and avoid turning the Bala into a managed Forest.

Sincerely,
The Stults Family

000248

Kenneth C. Scoggin,
Forest Supervisor
Gila National Forest
Silver City, N. M. 88061

Linda E. Baylers
Route 10, Box 306
Glenwood, N. M. 88039
October 2, 1985

OCT 17 85

DATE REC'D

Dear Sirs:

As of the summer 1985, the Proposed Gila National Forest Plan Draft Environmental Impact Statement (LIS), has been available for comment. Here then is my commentary. Specifically, plans for logging, cattle grazing, and off-road vehicle use are critiqued. The credibility of FOREPLAN/LIS is also briefly addressed.

"The sun, moon, and stars would have disappeared long ago if they happened to be within the reach of human predatory hands."

FRIENDS OF THE EARTH

1 LOGGING

I am opposed to logging proposals. All alternatives present undesirable plans for the forest. Alternative F appears attractive superficially, but seems to propose more logging and road building than I would like to see. Obviously then, I would find the other alternatives unappealing as they imply 78-53 MMBF to be logged annually in the first decade, while Alternative F allows 14 MMBF during the first decade. In Alternative F, an average of 23 MMBF annually per period is to be logged and thus grounds for my disapproval of Alternative F.

It appeared to me while reviewing the EIS, that the Gila Wilderness is to be logged. I am assured by representatives of the Park Service and National Forest Service that this is not so. Because of the way the National Forest lands finger into the Gila Wilderness lands, that the actual wilderness is not logged is of little comfort to me. Area 8B primarily consists of designated wilderness and is not to be logged. It is surrounded by area 4D

248-1

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 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 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 to 15 years and is 45% below the allowable sale quantity level in our existing timber management plan. Road construction is reduced as a result of the reduction in allowable sale quantity. The Proposed Action Alternative Summary of Changes contains a more complete description of changes that were made as a result of public comments. This summary is located in the front of the public comment document.

The changes in timber allowable sale quantity and changes made because of concerns expressed regarding the development of unroaded areas have resulted in the modified Proposed Action Alternative management actions only having a small effect on unroaded areas. 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 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 699,015 undeveloped area outside of classified Wildernesses. In the first decade the proposed alternative will result in the development of approximately 20,600 acres (3%) 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. These areas will be reconsidered for wilderness designation when the new plan is prepared.

As a result of the changes indicated above, very little of the area you are concerned about would be logged. None of the unroaded areas in management areas 4D, 6B, 2A, 5B, 5C, 5D, 2F, or 2G would be affected by logging activity in the first decade. Only 2,500 acres of the unroaded area in 4A would be logged. There would be logging in the portions of 6B that are presently roaded, but most of this has also been logged in the past.

LETTER 248

on the west, where 4,165 acres are available to log, and area 4A where 20,912 acres are up for cutting. To the north is area 6B including 81623 acres available for enterprise. There are 18,027 acres in area 2A northeast of area 8B presently unreserved as logable, and area 8A representing 21,804 acres unavailable to logging, but to the south of 8B, 7F has 10,817 acres to be logged.

To further exemplify this creation of "forest islands" safe from logging, proposed logging in area, 5B, 5C, and 5D have a similar isolating effect on areas 2F and 4C where no logging is in the plans. The creation of such islands untouched by saw or human predation is not in the best interest of threatened and endangered species, or wildlife in general requiring vast areas of land to be undisturbed and natural. I am opposed to proposals for logging and concomitant road building.

In the section discussing "prescriptions" (Pp 211-215), several prescriptions (i. e. C, R, W, G) describe logging on steep slope or slope, or both. At the end of the paragraph, the final sentence reads, "Any recreation prescription would be compatible with this prescription." To log 40% slope and 40% steep slope on terrain such as I have hiked in the Gila Wilderness indicates potential for disaster. The resultant erosion, mud slides and lost water retention by trees, formerly part of the watershed not accounted for in the EIS, seems a serious loss to the recreation experience. If one's recreation consists of cross country skiing or any type of hiking, the absence of trees has a serious impact on the recreation experience. The logging described in areas of steep rugged terrain where rains are sudden and intense often after long rainless periods, seems to make landslide/avalanche potential higher with every tree cut. I disagree with the EIS' evaluation of logging's impact on the recreation experience.]2

I see little discussion on the value a tree's presence has, but rather a full spectrum that the value a tree's removal has. A tree holds the earth together with its roots. It digests sunshine, making it one of the finest solar energy storage centers. When rains come, the earth is not washed away, instead being firmly held by the strong grip of a tree's roots. When the snows come the shade of a tree prevents rapid snow melt, ensuring a slow trickle of water to the soil below preferable to much flora.

According to the EIS (see p. 90, third paragraph), "The alternatives have little or no significant impact on several components of the environment . . .

- Groundwater recharge
- Flood plains
- Air quality
- Noise levels
- Urban quality
- Diversity of tree species
- Regeneration of timber stands five years after final harvest."

I have "Flood plains" and "Ground water quality" in particular question when I focus on the town of Mogollon, situated in area 4A. Mogollon has endured serious flooding under current conditions.

FOREST SERVICE RESPONSE TO LETTER 248

248-2

We appreciate your concern regarding the effect of logging on recreation experience and agree that in individual areas that are logged, the type of recreation opportunities will change. Even though specific areas may change, our analysis indicates that recreation opportunities for all types of dispersed recreation will continue to be greater than the demanded level. For example, the Gila National Forest presently contains approximately 780,000 acres of classified wilderness that is and will continue to be available for primitive type recreation. In addition, there will continue to be a considerable amount of acreage outside of the classified wilderness that is available for this type of recreation. Even though a small portion of the unroaded area on the Forest will be developed (as mentioned in response 1) the remaining acreage will be more than enough to satisfy the demand for primitive and semi-primitive type recreation.

The modified Proposed Action Alternative projects a sustained yield of timber from 272,000 acres of suitable timber land. [This is about 8% of the Forest that would be managed to sustain timber outputs.] Even when the Plan's effects are projected for 50 years, the Forest would continue to have in excess of 1,400,000 acres (44% of the Forest) available for semi-primitive or primitive recreation. This is more than enough to satisfy projected demand. That is why we stated that "any recreation prescription would be compatible with this prescription".

Converting an additional 20,912 acres or 25% of area 4A to the unforested portion would result in serious erosion and convert this land of canyons and deep gullies into a wasteland after a few heavy rains. I object to logging this area, especially in areas above Mogollon.

Table 47 on p. 104, shows plan PA, B, C, AND F all resulting in comparable acreages of "satisfactory cattle range". Questions arise as I calculate average annual logging per period in MMBF. Plan C allows for an average of 40.6 MMBF logged annually per period, Plan F for an average of 23 MMBF logged annually per period. According to table 47, page 104, they both result in 1670 M acres of "satisfactory rangeland". This projection leaves me with doubts as to the EIS' or FOREPLAN's credibility. (see enclosed table)

While the answer to this discrepancy may be that Plan C offers more funding to "improve rangeland" than does Plan F (improvements consisting of fences, pipes, tanks and planting palatable grasses), even if this could prevent erosion, it is at the taxpayer's expense. Repairing damage done by timber companies in ranching interests is subsidized by the taxpayer. I disapprove of this.

ANNUAL LOGGING PER PERIOD

PERIOD →	PERIOD 1	PERIOD 2	PERIOD 3	PERIOD 4	PERIOD 5	AVERAGE ANNUAL PER PERIOD
PLAN						
Average A	31 MMBF	32.5	35.5	38.5	40	38.5
B	37 MMBF	37.5	37.5	37.5	32	37.5
C	43 MMBF	40	40	40	40	40.6
D	53 MMBF	46-50	46-50	46-50	46-50	49
E	28 MMBF	25-27	25-27	25-27	25-27	26.4
F	14 MMBF	26	25	25	25	23
PREFERRED ALTERNATIVE	35 MMBF	41.5	41.5	41.5	48	41.5

see = 104 of EIS
for funding in these
areas

* resultant average considered
"satisfactory range"

248-3

Timber harvest from area 4A has been changed in the Proposed Action Alternative. Only 1,110 acres would be logged in the first decade. Only approximately 4,800 acres are included as suitable for timber activities. Timber activities in these areas are not expected to significantly effect water yield.

We also feel that we need to comment on your statement that "Converting an additional 20,912 acres or 25% of 4A to unforested portion would result in serious erosion and convert this land of canyons and deep gullies into a wasteland after a few heavy rains." Even if we were still going to manage the 20,912 acres of forest for timber outputs, what you indicate would happen would not happen. First, you refer to the "unforested portion." The silvicultural prescription proposed for harvest of timber on the Forest is primarily a shelterwood system. Under this system, there are always some trees present to shelter the site. The final overstory is not removed until regeneration is established. Clearcuts are only done to provide wildlife openings. These would be small.

Secondly, you speak of serious erosion caused by timber activities. Timber activities do cause increased soil loss, but activities are controlled so that the increases are short-term and do not reduce the productivity of the site.

248-4

You seem to infer that there should be a direct relationship between timber harvest and satisfactory range condition. Actually there is little relationship. Satisfactory range condition is defined as "rangeland in range condition class of at least fair with stable or upward trend." When timber harvest is conducted in an area, the timber canopy is reduced. This allows more light to reach the forest floor. Forage growth is actually stimulated by this increase in light and range condition increases. Since shelterwood harvest methods are used, however, this increase in forage is often of short duration. The trees that remain grow to fill the space left by those harvested and, over time, the forage again begins to decrease. The increase in available forage was calculated and included in the computer models used, but since the area harvested is a small percent of the Forest, the increased forage is not very significant.

So, as you can see from the above discussion, range condition actually increases as a result of timber harvest. It does not decrease as you assumed.

2. CATTLE GRAZING

Although cattle seem to result in less environmental damage than logging, I do not feel cattle grazing on public lands to be economically feasible. The cattle industry seems on the decline as many local ranchers are experiencing economic hardship. They seem to feel the reason for this is the bad press eating beef has received in recent years. People do seem to be getting away from consumption of red meat. It seems foolish for the Forest Service to support an industry in this predicament. It seems that much more foolish for me to stand by as a taxpayer allowing my tax dollars to build tanks fences, pipes and create a suitable environment for cows less and less appealing to the consumer. I therefore oppose leasing land to cattle grazing less on environmental grounds than on economic ones.

3. OFF-ROAD VEHICLES

I am vehemently opposed to any provision for off-road vehicles (dirt bikes, three-wheelers, four-wheel drives) used in recreation. Certain provisions for search and rescue routes are most acceptable since they would be used on an emergency basis. Any off-road use beyond this is superfluous. The type of recreation involving these motorized vehicles results in damage to flora and noise pollution to wildlife, particularly sensitive to these roaring motors. The Gila is a special place, it has potential to fulfill the visitor in a very special way. One can view wildlife here found in few other areas, and experience a peace rare in this day and age. Many places are noisy and fast-paced. The three-wheelers are not hard-pressed for a suitable environment: the cougar, black bear, big-horn sheep, peregrine falcon and bald eagle are dangerously short of a suitable habitat. I support keeping roads as a roadless and the prevention of off-road vehicles.

4. EIS CREDIBILITY

Finally a comment on the EIS as a project. I am impressed by the bibliography. A broad range of sources seems to have been used. It is appreciated that plans are available for feedback from the public and encouraging that public input is considered. It disappoints me, however, that of a thirty-six member list of preparers, only two were women; the two women being computer experts. It seems a broader view is realized when the group is more heterogeneous; the aesthetic value of the forest may have had more priority if a greater cross section of people had devised this plan. This is purely speculation, but I felt it worth noting.

The wording and arrangement of the EIS is especially confusing and redundant. It seems apt to confuse and inhibit comment. It is obscure as to what many assumptions and conclusions were based upon. When credibility is threatened in a few areas, plausibility of the whole is doubted. A more readable and clearly substantiated document may have a more constructive effect.

248-5

You infer throughout your response that the Forest Service should not subsidize Forest users at the expense of the American taxpayer. In this particular comment you refer primarily to grazing but you have also referenced timber.

As a matter of principle, we do not believe that it is appropriate to single out Forest Service permittees, 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 permittees and timber operators are but one among many Forest users who sometimes receive benefits in excess of costs.

248-6

We disagree that the Forest should be closed to off-road vehicle use. 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 produce resource damage. Closing the portions of the Forest that are not receiving resource damage or where significant conflicts are not occurring would be equivalent to arbitrarily closing some portion of the Forest to hiking. The management philosophy on the Forest has been and continues to be one of imposing restrictions 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.

248-7

Thank you for your comments on the EIS readability. We have tried to make the documents readable and still meet all of the requirements established by the National Environmental Policy Act and the National Forest Management Act. This is very difficult, and we regret that we have not been able to do this to your satisfaction. Without specific examples, however, it is not possible for us to further address your concern.

CLOSING STATEMENT

"We must all see ourselves as part of this earth, not as an enemy from the outside who tries to impose his will upon it. We who know the meaning of the pipe, also know that being a living part of the earth, we cannot harm any part of her without hurting ourselves."

—LAWL DILL

The forest seems another industry, another mean, to get rich. Man does not live by dollars alone, boys. These lands have a purpose and a need, our well-being relies upon it. Man, as do all creatures, requires a certain degree of wilderness. Once you fellows have messed with it, that is, "managed" and "prescribed" all over it, it is no longer the wild forest in its pristine and primitive form. Rather, it is a landscape of man, "prescribed" and "managed" by man far inferior to the *garden designed by God*. "In wilderness is the preservation of the world," spoke Henry Thoreau. Wallace Stegner said, "Wilderness is part of our geography of hope". Man needs the forest for his physical well-being as we know, but what is rarely stressed is the role of wildlands in relation to *man's sanity*. People need a place untouched, pristine, peaceful and safe from the predatory grips of human enterprise where they can just be, regain touch with their soul, and put their lives back in perspective with the earth. In the name of the human species, leave the forest alone. Let the interaction man has with the forest be confined to the spiritual.

Sincerely yours

Linda E. Bayler
Linda E. Bayler

cc Kenneth Scoggins, Forest Supervisor
Bill Richardson, Congressman
Jeff Bingaman, Senator
Pete Domenici, Senator
Jim Norton, The Wilderness Society

LETTER 250

Supervisor

000250 10-13-69

I urge you to support the 'Earth First'

Wilderness purposes for the Baka National Forest.
All roadless portions of the Baka Forest should
be preserved forever as wilderness.

Done w/ g
Jack Rivett
2721 W. Cullen Canyon
Flagstaff, AZ 86001

FOREST SERVICE RESPONSE TO LETTER 250

250

250-1

Thank you for your comment. For the comments that address your concerns,
please refer to the responses to the comments in letter 002.

000251

Forest Supervisor
Gila National Forest
2110 N. Silver Street
Silver City, New Mexico 88061

Route 1, Box 250
Staunton, Virginia 24401
Oct 14, 1985

USA National Forest
System

OCT 17 '85

DATE RECEIVED

Dear Sir:

I wish to give my strongest support to the Earth First! proposal for 113 acre wilderness that would unite the Gila and Aldo Leopold wildernesses and suitable additions.

Biogeographic studies show that our wilderness areas are by far too small to protect diversity and the species they contain from eventual extinction. Rather we need well integrated preserves with ample core areas, buffer zones and adequate resources. Most of all we need to protect and expand wilderness.

Sincerely yours
Robert F. Mueller
Robert F. Mueller PhD

251-1

Thank you for your comment. For the comments that address your concerns, please refer to the responses to the comments in letter 002.



Native Plant Society of New Mexico

October 04, 1985

000252

Kenneth C. Scoggin
Forest Supervisor
2610 W. Silver Street
Silver City, NM 88061

U.S. NATIONAL FOREST
SILVER CITY, N.M.

OCT 15 '85

DATE RECEIVED

Dear Mr. Scoggin

Recently it has come to our attention that comments regarding the formulation and implementation of a management plan for the Gila National Forest in New Mexico are being solicited. As you may be aware our organization, the Native Plant Society of New Mexico, of over two hundred members statewide is vitally interested in protecting native plants, especially rare and threatened plants and endangered habitats such as riparian areas. We hope the U.S. Forest Service will take all rare plants into consideration when making its recommendations in drawing up the Gila Forest Plan by designating Research Natural Areas (RNAs), Special Interest Areas (SIAs), etc.

In the Gila National Forest we would be especially interested in protecting *Allium gooddingii*

PO Box 5917 Santa Fe, New Mexico 87502

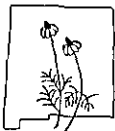
252

252-1

The proposed Gila National Forest Plan calls for considering the needs of threatened, endangered, or sensitive plants and animals in implementing all resource activities.

252-2

Allium gooddingii and *Senecio querens* have been nominated for Federal protection as Threatened and Endangered species. 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, however, the importance of input on this subject from organizations like yours. 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 that you have recommended for classification as RNAs. An example of the way these standards and guidelines are written follows: Inventory the upper Mineral Creek area to determine if part of the area should be considered for RNA designation. If any areas appear to qualify, make a recommendation to the Regional RNA study committee so that the areas can be evaluated in relation to other areas in the Region.



Native Plant Society of New Mexico

and *Senecio. guarea*. The species should both occur in the Upper Mineral Creek area which we would recommend be designated a Research Natural Area and Willow Creek which we recommend be designated a Botanical Special Interest Area.

In addition we would recommend that there be no steep slope logging as this will cause irreparable damage to riparian areas. We also urge the inventory and monitoring of sensitive and threatened plants which is critical.

The Tularosa Wetlands should be closed to all off road ~~vehicles~~ vehicles which should be limited to designated roads throughout the Gila National Forest. In addition this area should be fenced and closed to cattle grazing.

Protection of riparian areas along the Gila River on the Forest should be protected also, especially near the area where Mogollon Creek joins the Gila. Also the proposed Connor's Dam should be addressed in the plan. While not on Forest Service land itself, the dam

PO Box 5917 Santa Fe, New Mexico 87502

252-3

Timber harvesting and road building do not necessarily result in excessive erosion and loss of riparian habitat. Sale contracts call for erosion control measures to prevent excessive erosion from skid trails, landings, and roads. The greatest soil loss occurs from areas in unsatisfactory watershed condition. This in turn creates the greatest impact on riparian habitat from the off-site movement of precipitation in large quantities. Areas given complete protection require lengthy periods of time in order to return to a healthy condition. This is particularly true in areas where the site has deteriorated to the point where the larger vegetation is no longer present. Some of the most damaging floods on the Gila National Forest have occurred on watersheds that have been totally or largely protected by wilderness designation since 1924.

252-4

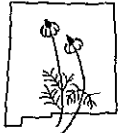
The Tularosa Wetlands are closed to off-road vehicles. Cattle grazing of the area is only permitted during the non-growing season portion of the year. By allowing grazing only during this portion of the year, riparian conditions should improve.

You also commented on ORV use of the Forest. It is the policy to provide as much freedom to use the Forest as possible as long as resource damage is not occurring or resource conflicts are not high. ORV use is recognized as a legitimate recreation activity. Historically, this type of use on the Forest has not been highly concentrated and has generally not resulted in significant resource damage. If resource damage begins to occur, specific areas will be closed.

252-5

Standards and guidelines have been added to the final Plan to clarify our management of riparian areas. Please see the Proposed Action Alternative Summary of Change for a more complete summary of the changes made to clarify management of riparian habitats.

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.



Native Plant Society of New Mexico

would severely damage the riparian areas along the lower Gila on the Gila National Forest.

Once again, we would urge the U.S. Forest Service take the necessary steps to protect New Mexico's unique plant heritage for all of our citizens' use and enjoyment. We welcome this opportunity to make our comments and hope the U.S. Forest Service will consider protection of our rare and threatened plants a vital part of the plan. Thank you from plant enthusiasts throughout New Mexico.

Sincerely yours,
Theodore B. Hobbs
President

LETTER 253

FOREST SERVICE RESPONSE TO LETTER 253



NEW MEXICO BUREAU OF MINES & MINERAL RESOURCES
Socorro NM 87801

A DIVISION OF
NEW MEXICO INSTITUTE OF MINING & TECHNOLOGY

000253

October 11, 1985

Kenneth C. Scoggin
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr. Scoggin:

Enclosed please find comments concerning the
Environmental Impact Statement and the Gila National
Forest Plan. We appreciate the opportunity to
comment on these documents and hope the enclosed
comments are helpful.

Sincerely,

Virginia McLemore, Geologist

Ronald Broadhead, Petroleum Geologist

Frank Kottlowski, Director

VM/ld

Enc

NEW MEXICO TECH IS AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION INSTITUTION

LETTER 253

COMMENTS

Summary of the Draft Environmental Impact Statement for the Gila National Forest Proposed Plan

- 1 Need to locate on maps the mining districts and active mines] 1
- Draft Environmental Impact Statement,
Proposed Gila National Forest Plan
- 2 P 62, line 7 Paleozoic and Precambrian should be] 2
capitalized
3. P 62, line 7 Should read Paleozoic and Precambrian times] 3
(Precambrian is not an era)
- 4 P 79 and 185 The correct name for our organization is New] 4
Mexico Bureau of Mines and Mineral Resources
- 5 P 79, 1st sentence under Minerals Exploration for and]
extraction of minerals, energy resources, and common variety]
materials do not have to have an adverse impact on the] 5
environment Many of the environment problems encountered in]
developing most minerals occur in small areas and can be]
easily circumvented
- 6 P 80, Table 22 Acreage for demonstrated favorable] 6
prospecting and perhaps some other classes is extremely]
conservative
- 7 P 81, Future Trends This section needs to be evaluated] 7
based on a mineral resource assessment Other areas may be]
favorable besides old mining districts
- 8 P 115, last paragraph "There are no known areas in the] 8
Forest " Requires a mineral inventory and a mineral]
resource assessment to make this statement true
- 9 P 116 Access must be allowed to existing mineral rights] 9
and active mines therefore Alternative F is undesirable.
- 10 P 116, Irreversible and Irretrievable commitment Actually]
the Forest Service indirectly controls extraction of minerals] 10
by not allowing access not allowing roads to be built, etc]
- 11 P. 6, "Issues and Opportunities Addressed" does not mention] 11
the exploration for and development of mineral resources
- Proposed Gila National Forest Plan
- 12 P 48, Go2 Temporary occupancy may be needed for] 12
exploration and mining and should be allowed This occurs in]
several additional places in the Plan

FOREST SERVICE RESPONSE TO LETTER 253

253-1

The locations of active mines have been shown on the map. We are not showing mining districts because we feel that little would be gained from displaying this information.

253-2

Editorial change made.

253-3

Editorial change made.

253-4

Editorial change made.

253-5

We agree. A clarification statement has been added.

253-6

The indicated acreages were made by our professional in-house mining engineer and geologist based on their best professional judgement and the information at hand. You have not submitted any factual information that would cause us to dispute the acreage figures.

253-7

You may be correct; however, for the next decade we stand by our future trend statement.

253-8

This statement was made based on the advice of in-house mining engineers and geologists. We agree in part with your statement; however, our professionals used the best information at hand. We cannot wait or delay the Forest Plan until this information is gained. Even if it were available now, little effect on land allocation decision is expected.

253-9

We agree.

253-10

We agree.

253-11

In public scoping sessions, prior to beginning work on the Forest Plan, exploration for and development of mineral resources did not surface; consequently, they are not shown although they most definitely have been considered.

253-12

We are stating that we will not allow structures associated with mineral leasing to be put in our developed campgrounds. We have closely adjacent areas that will be available for this.

LETTER 253

- 13 P 34, 62, 66, Mineral policy in Wilderness Areas Some commodities do not occur on the surface and require drilling--surface examination of these areas will not determine validity of the claims 13
- 14 P 11 Correct name is New Mexico Bureau of Mines and Mineral Resources 14
- 15 P 39, Minerals Would add An evaluation of the mineral resource potential is needed to adequately assess the mineral resources in the Gila National Forest " 15
- 16 Section 5, Monitoring Plan No mention of minerals in monitoring plan 16
- 17 P 11, Exploration for and production of oil and gas does not have to permanently and adversely impact the environment 17
- 18 P 112-119, To completely prohibit soil disturbance activities may preclude any exploratory and all drilling activities for oil and gas The statement given in the plan should make reference to a map that shows the occurrence of the Datil and rhyolitic soils 18

General Comments

- 19 Need geologic and economic data in unevaluated areas of the forest, including geologic mapping 19
- 20 Need to improve the data base by an inventory of known occurrences and mines 20
- 21 Active and inactive mines should be added to the accompanying maps 21
- 22 Pursual of the List of Preparers (p 135) shows a lack of minerals, energy, and geological expertise Geologists must be part of the process early and then on a continuing basis 22

FOREST SERVICE RESPONSE TO LETTER 253

253-13

We cannot find how your comment relates to the pages you cite. A valid discovery of a mineral located within wilderness had to be made on or before December 31, 1984. A discovery cannot be made after this date; surface examinations in most cases will be sufficient to determine validity.

253-14

Editorial change made.

253-15

We agree that this is desirable; however, economic constraints would not permit this decision without foregoing some other higher priority item.

253-16

The USDA Forest Service is a surface management agency, not a mineral management agency. As such, surface impacts resulting from mineral development will be monitored by periodic review of approved plans of operation.

253-17

We totally agree.

253-18

Oil and gas development and/or exploration can take place on datil and rhyolite soils providing soil stability is maintained.

253-19

We agree. Economic constraints required us to go with the best available information.

253-20

Same comment as 19.

253-21

Active mines have been added to the map.

253-22

In-house professional mining engineers and geologists were very much involved in the preparation of the Plan. In fact, much of the material was written by professional mineral employees.

LETTER 254

FOREST SERVICE RESPONSE TO LETTER 254

October 9, 1985

254-1

Thank you for your comment. For the comments that address your concerns, please refer to the responses to the comments in letter 002.

000254

Forest Supervisor
Gila National Forest

Dear Forest Supervisor,

As a resident of Tucson for the last ten years, as well as an avid backpacker, I have had many opportunities to visit the Gila National Forest. It is a remarkable region. I can certainly understand why it became home to this nation's first Wilderness Area in 1924.

I personally feel that much more of the Gila National Forest deserves wilderness status, and so I was delighted to learn recently that Earth First' has submitted a wilderness proposal to you. I strongly agree with their idea that the North Star road should be closed, reuniting the Gila and Aldo Leopold Areas into the one great wilderness that it was originally.

The other points in the Earth First' proposal are also sensible. Promoting wilderness, and the tourism industry that accompanies it, provides a stable, long-term economy that benefits everyone. That claim cannot be made for overgrazing or deficit timber sales on marginal lands.

I hope you will give serious consideration to implementing the Earth First' wilderness alternative.

Sincerely,



Jim Hasbargen
4610 E. 26th St.
Tucson, AZ 85711

255-1

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 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 690 miles of roads. This is a 57% 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. Sixty five percent of these roads would be closed after timber activities are completed. For a more complete summary of the changes made to the Proposed Action Alternative, see the Proposed Action Alternative Summary of Change located in the front of the public response document.

255-2

ORV use is recognized as a legitimate form of recreation. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

255-3

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated totally from reviewing the dollars received from stumpage. Timber harvest can be utilized to increase wildlife habitat diversity and to increase forage for wildlife and domestic livestock. These are additional values that are derived from the sale program which are not considered in the appraisal process.

255-4

We re-evaluated our non-wilderness recommendation on the two wilderness study areas and feel the recommendation is still appropriate. Our rationale for this recommendation is included in the Proposed Action Alternative Summary of Change.

255-5

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. The Proposed Action Alternative Summary of Change indicated the development effects on individual areas.

October 8, 1985
000255

Dear Sirs:
I am sorry that I was too busy to respond about the Gila National Forest Draft Plan until 6 pm tonight which means the mail won't go out till 5 pm Oct. 9 and reach you till Oct 10. However, even belatedly, I hope this postcard will give you one more argument against putting more roads into the Gila National Forest and opening it to more timbering and more offroad vehicle use, both of which will destroy much of the area and its water values. Timbering the last 5 years already cost 2 million in out tax money. Cut back - don't increase it. Road building destroys the wilderness for future, horseback riders, the flora and fauna and helps fill the water supply. Please do not designate wilderness as designations for Lower San Francisco Canyon and Hells Hole. Please help keep

road base and close down the Mogollon Rim from the Blue Range to the Gila Wilderness. Finisco Big Eagle Pass and areas adjacent to Aldo Leopold Wilderness. Sincerely, Mrs. Hallock

256-1

RALPH A. FISHER, JR.
P O BOX 1048
SILVER CITY N M 88068
505-235-2320

000256

October 2, 1985

Mr. Kenneth C. Scoones
Forest Supervisor
Gila National Forest
2610 N. Silver Street
Silver City, N.M. 88061

Dear Mr. Scoones:

This will be a day or so late, but I would like to comment on the Proposed Gila National Forest Management Plan and Draft E.I.S. I never did find time to completely read the two volumes covering the Plan and the E.I.S., but both Ron Henderson and Bruce Anderson urged me to please sign and send in my comments.

Generally the plan appears to be a good one and I would like to commend you and your staff for a thorough job well done. The objectives of the plan and the plan structure and principles are good ones and well taken. If the Proposed action is accepted and followed as close as possible, or as close as politics and money budgeted will allow, then fifty years from now the Gila should be in reasonably good condition.

There is, however, and unfortunately, too much emphasis being put on timber harvest and road construction on the Gila, as on all National Forests in the country, due mainly to the big pressures being put on by the present ill-advised administration. The idea of cutting timber on steep slopes in the future, just to appease the lumber industry is ludicrous and foolish, especially on such slopes as on the north and west sides of places like Signal Peak. I have always felt that the entire area of Signal Peak above the 8000 foot bench should be left as is and never logged.

Most of my comments that follow will be directed at the Proposed Plan pages one through 22.

On page 7 under planning principle #1 it is stated that "Management for goods and services requires an awareness of the interrelationships of plants, animals, soil, water and other environmental factors with each ecosystem. This principle was the foundation of the planning process." If so, how then could you emphasize timber cutting and road building at the rates that they are being run in the plan, and at the cost of de-emphasizing other more important objectives? It amounts to the fact that you are favoring the timber interests just as the B.L.M. is favoring the livestock interests with the majority of their planning.

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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed, and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

256-2

On page 3 in "8 - Protection of all Forest and rangeland resources from depredation by forest pests. Unfortunately sheep and cattle and ORV's are not considered "forest pests" in this principle. They do much more total damage than all of the insects combined.

On page 5 it is stated "there is a need for more commercial timber than can be supplied by conventional logging methods. Opportunities exist for harvest of additional timber on steep areas that are not presently being logged. I have commented on this point above. Most of the harvestable timber is ponderosa, lumber that is not all that much appreciated by builders. So called "Oregon pine", actually Douglas fir, is much more preferred. It is also stated "there is a limited supply of fuelwood available for use". This is obviously true, however, better and closer management over what is cut for fuelwood would help immensely. For instance, the indiscriminate cutting of the large alligator junipers needs to be monitored and stopped. There are hundreds of small seed-type junipers for every one of the big trees that should be cut instead. The problem is that woodcutters will rather cut the big ones just to be macho and prove they can do it. They overlook the fact that it takes considerable more time and effort to cut and haul and split the big ones. They also do not realize that they are the seed trees. If woodcutters were forced to cut the seed-trees instead it would be a far more effective way to thin out the understory that is such acellent timber for forest fires.

On page 6 under Plan 2 it says to cut one of the principles is to improve range management, and current livestock use exceeds production capability. Through the years we have always been assured that no allotments were ever overstocked or overgrazed. Now you are admitting what we knew all along. If grazing fees were raised to what they should be this money could be put to use to make the range improve itself. The permittees should be required to foot the bill, since they did the abusing, instead of the taxpayers. "Reducing capacity with permitted numbers will improve the ground cover, etc." For the first period, at least, several allotments ought to be closed to grazing completely and the time required to ground cover will happen much sooner. Why is this so difficult to fathom?

Under Land use - I have always gone along with land exchanges where the public lands are the better actors, but not when the public land goes to a promoter or developer, who in turn makes a killing on selling the land in parcels. I could name a couple of them, but I won't.

Under recreation - vehicle use on public land of any sort is not a right, as you and many people believe. It is a privilege that one earns, just as driving a vehicle is a privilege not a right. Many others object to offroad vehicle use. I am one of them. It really makes my blood boil when I drive around the Inner Loop, and other places, and I see all of the new "roads" that have been cut into the forest by four-wheelers who feel they have a right to go where they want to just because it is done on T.L. roads. These "roads" quickly become badly eroded dropouts so they can never be used. This practice

needs to be stopped now, not 20 years from now when the ruts will be quilled or removed. Yet you say that ORV opportunities will increase. Too bad.

We agree that the cutting of large alligator junipers needs to be monitored; however, the solution proposed is as unacceptable as indiscriminate cutting. The intent of the management of this forest type should be to maintain the growing stock in a healthy condition with a distribution between all age classes (old growth through seedlings). Restriction of cutting to the smaller diameters would result over time in a stand of old growth trees with little or no understory. This type of forest would have little diversity and would eventually be more susceptible to destruction from disease.

256-3

We disagree with your inference that the public has historically been told there are no areas on the Forest where overgrazing is a problem. This data has always been public information and has been stated many times in the past. The Forest has been working on this problem since the National Forests were established, and has made a lot of progress toward its resolution.

You also commented on the price charged for grazing and suggest a price increase as a solution to grazing problems. The price that permittees pay for the privilege of grazing is determined by Congress. Under existing law it is true that higher grazing fees would produce more funds for the development of needed improvements, but such a grazing fee increase is outside the scope of this Plan.

256-4

The solution to the problem of "overstocking" is not as simple as it seems. In order to make a defensible decision it is necessary to complete the needed inventories to determine not only if a problem exists but to define the magnitude of the problem. Dependable data on range forage production cannot be gathered in any one season due to the many variables involved that affect plant growth. Neither can the effects of changes in management be honestly evaluated in the first season after the change is implemented. To establish the productive capacity of a given area requires that data be gathered and analyzed over a period of several growing seasons. Once the productive capacity has been evaluated then a stocking level can be established. This indicated stocking level can then be compared to the present permitted stocking level to determine if a problem exists and also determine the extent of the problem. Due to these complexities, establishing stocking levels is a time consuming process and the amount of area covered in any given year or decade is limited by the number of personnel available to accomplish the inventories. Constraints imposed by budget limitations do not permit the solving of all of the problems identified in the Plan in the first decade.

256-5

ORV use is recognized as a legitimate form of recreational experience. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

Under Wildlife - "Habitat requirements for some wildlife conflict with other species and other resources." In other words livestock utilization.

"A moderate overall improvement in existing carrying capacity will occur by the end of the fifth time period." Not if cattle grazing is allowed to increase, as you predict, over the same period. Studies over many years, in every western state except New Mexico, show that cattle and wildlife do not get along. Besides, how are any animals being known in an area will look like if not covered with (managed) any number of years from now?

Page 7 - Timber Production - It has been my understanding that the Forest Service sold all of their road equipment years ago and roads have never been the same since. Even back then the roads were usually maintained mostly to benefit hunters and timbermen. "The overall maintenance condition of the roads will decrease during the first period." Any of them can't get much worse.

Page 8 - Wilderness - You say that the Lower San Francisco has been recommended for non-wilderness use and that it will remain open for vehicle use. This is a crying shame. Especially since under the very next item - riparian - you state how the riparian habitat is very important to many species of wildlife and public recreation use. ORV use should not be one of them. On page 13 under Research Natural Area you are proposing Turkey Creek as a riparian RNA. The Lower Frisco would make a much superior riparian RNA area than Turkey Creek, or any other area in the state.

256-6

Some of the main issues identified at the start of the planning process were grazing and the production of wood fiber. Since wildlife are affected by changes in habitat and some species compete with cattle for available forage, it is proper to recognize that conflict exists. It is also true that there is competition between species for forage and cover. The Proposed Plan attempts to seek the best available balance to minimize the impact of these interactions. Under the Proposed Plan, wildlife habitat diversity increases over time, thereby providing benefits for both game and non-game species and birds. Domestic livestock grazing does not increase as you state, but is actually reduced by 10 percent.

256-7

The Forest Service has not sold all of their road maintenance equipment, nor is the road maintenance program designed to favor any particular groups of users. The decline in the amount of road maintenance accomplished annually is the direct result of reduced budgets for this activity. Timber sale operators are contractually required to do periodic maintenance on those roads which are used for hauling their sawlogs.

256-8

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 80 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 indicates that the majority of this use occurs in the area where Big Dry Creek empties into 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 non-wilderness recommendation.

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.

We do not agree that the San Francisco River would make a better research natural area than Turkey Creek. The Turkey Creek is one of the few riparian areas on the Forest that has little grazing activity. As such, it is one of the more natural riparian areas on the Forest.

256-9

Under riparian you state "to wildlife, livestock, and public recreation can co-exist in riparian habitat." Not in any that I have observed over the past 30 years. In any riparian area where livestock are allowed to graze, new seedlings of the very trees that make it a riparian area never get a chance to make it because they are stepped on and browsed down to nothing and when the old canopy trees die out that ends your riparian zone. The entire Gila Valley is an excellent example. Even on the Nature Conservancy's Pinalo area the seedlings are not making it because one rancher feels he still has a right to run his cattle there and because no one has yet devised a way to stop the fences straddling the river from being wiped out by high water and allowing the cattle to enter, or to keep the rancher from cutting the fences. Livestock concentrations in riparian zones and upper riparian zones should be discontinued until the zones improve 100% instead of increasing concentrations by 10x 10.

Riparian habitat coordination and improvement should be much higher than riparian and watershed protection levels should be even much higher.

Page 10 - Develop recreation - Cherry Creek Campground should be closed and allowed to recover much the same as the old campground and Pine Flats were closed back in the fifties. In fact Cherry Creek should have been closed at least ten years ago. It should be moved to a new location but not back to the old one. Recently it is a barren dust-bowl during dry spells and a mud-hole when it is wet. There is virtually no vegetative ground cover left.

You say that fees should be charged at only three sites on the Gila. Fees should be charged and increased at nearly all sites and the fee money used for patrol, clean-up, and maintenance. "The Gila will never reach its full practical carrying capacity during the planning period. The remaining areas will not." You do not know this positively?

Under item 10-11 - "Provide forage to the extent benefits are realized to the land without impairing land productivity..." It was recently announced that costs several millions of dollars each year to do the paperwork on the grazing allotments that is taken in fees. Again, increasing the grazing fees to what they should be would take care of this expense plus cover the costs of improvements. Taxpayers should not have to pay these costs. Increased fees would also hasten the improvements now instead of 10 or 50 years from now. Over a 20 year span our time is going completely to hell. 37% unsatisfactory allotments is still entirely too ridiculous. It sounds as though there are those who need to lose their allotments and give them to others who might appreciate having them and take better care of them.

Page 12 - Minerals - No more new mineral leases should be allowed, especially those so-called promotional ventures. Here also, fees need to be used liberally. We are not getting near enough money for what is being extracted and for what the ore is being sold. And, what a sorry imbalance - 242,000 acres under lease but only 17,000 acres withdrawn. The majority of reports that I have read over recent years all say the same thing, the minerals are just not there in quantities that would be cost effective to get them out. So why bother?

Soil & water - These should have top priority over everything else. Without them you don't have any of the others. You always find water, livestock, and minerals top priority. All of the government agencies need to get their priorities in proper order.

"That program could have created unacceptable soil erosion and reduced water quality on 301,000 acres within the Gila. The

The Plan recognizes the importance of riparian habitat. Where cattle use is contributing to site deterioration the Plan proposes to address the situation through changes in grazing methods and/or control of livestock through fencing. Utilizing these methods will allow these sites to improve in condition and increase plant diversity; however, the recovery process to return these sites to good condition with proper plant diversity is slow and takes lengthy periods of time.

In order to clarify our intent as it relates to the management of riparian areas, several standards and guidelines have been added to the Forest-wide standard and guideline section of the Plan. In addition, the riparian environmental effects section in the Environmental Impact Statement has been revised. The Proposed Action Alternative Summary of Change specifically indicates the standards and guidelines that will be added.

We also need to note that the 10 percent increase you reference is a misinterpretation of the table you reference. This is actually a 10 percent increase in riparian stand structure as a result of a reduction in concentrations. This table has been clarified in the Final EIS.

256-10

The campground that you refer to was constructed by the CCCs and is a very heavily used area. When the existing facilities in the area are no longer usable, we will review the area and consider relocating it to a more appropriate area.

256-11

Recreation fees are charged at sites where a full level of services is provided [water, sanitary facilities, tables, and site cleanup]. At present, only three areas qualify as full-service sites. The issue of charging fees for other areas of recreational use is a national issue and cannot be addressed within the scope of this Plan.

256-12

Please see our response to your comment number 3 and number 4.

256-13

Leasable minerals on the Forest are primarily energy minerals (oil and gas). Development will not necessarily take place every place a lease is granted. 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 evaluated for environmental effects and compliance with the lease stipulations. Generally, oil and gas leases have been very cooperative and abuses are rare.

The continued supply of energy minerals is important to the country's economy and defense. Minerals exploration and development is a legitimate use of federal lands.

256-14

Not all of the watershed problems are the result of past management practices. Many of the watersheds in the Gila National Forest contain large areas of low productive soils. Once denuded, or where vegetative cover is greatly decreased through fire, insects, and disease, or overgrazing by cattle or wildlife, these soils are slow to recover due to their low productive capacity. Once in poor condition, these areas compound the problem for soils on the watershed that are downstream. We agree that soil and watershed condition are very important. That is why all of the alternatives result in lower soil loss and improved watershed condition over time.

page

Ralph Fisher

overall Forest annual average soil loss is 5.6 tons per acre. Watershed areas in unsatisfactory condition amount to approximately 25% of the acres on the Forest." In other words some one has not been doing their job. First of all do away with the ridiculous idea of building a Connor or Looker Dam which is not needed, and put all of those millions of dollars into restoring the water beds to what they should be. It would put a large army of people to work for several years and it would put the water back into the underground aquifers where it needs to be. Trappers are going to have to pry through the nose for years to run for the dam. I would prefer that my tax money went to reform the watersheds.

Page 13 - Lands of special uses - By all means lands containing vital threatened and endangered species habitat, or vital wildlife habitat, wetland, riparian areas and all other water oriented lands should be protected and improved at all costs.

Page 15 - Under land needed to meet the needs of expanding communities you list the Village of Central. I do hope that you are not considering turning over more lands of Ft. Bayard to Central. They obviously do not need any more land since they have never made any effort to utilize the parcel that Sen. Joe Montoya got for them several years ago. So why give them any more?

Page 17 - Law enforcement - "the current level of law enforcement and protection is inadequate and does not meet public expectations." When increased grazing, timber, and other use fees (wood-cutting, mineral leases, etc.) could bring in necessary funds to fund a law enforcement branch of the Forest Service, which is certainly needed. There is too much illegal wood-cutting, over-crowding, littering, and other violations that must be stopped and the offenders prosecuted and fined, not just slipped on the wrist.

Page 18 - Timber and fuel load - there should never be any clear-cutting allowed on the M12. Nor any cutting on extreme slopes by any method. The McKnight burn happened 35 years ago and still there is no sign of revegetating because the soil is gone. That statement would be true if logging is done on steep slopes. But the criteria that are mentioned that qualifies lands or not for timber production there is no reason to clear-cut or to cut on steep slopes.

These are my feelings and I thank you for giving me the chance to voice them. I had a fine time to more thoroughly read the two volumes I would have more.

Sincerely,



The issue of Connor Dam is outside the scope of this Plan as it is the proposal of another agency. If a proposal is formally made, we will evaluate and comment on the proposal at the time.

256-15

Threatened and endangered species habitat will be maintained or improved. Riparian condition will improve over time.

256-16

No lands will be turned over to any community unless a demonstrated need exists for community expansion.

256-17

As stated in the Plan, there is an ever increasing need for law enforcement. Under existing law, the Forest Service is not allowed to utilize fees to fund or increase funding for programs. Although this is a potential solution, it will require an Act of Congress before it can happen.

256-18

The only clearcuts planned on the Forest are to create small wildlife openings. Most timber harvest will use the shelterwood silvicultural system.

Using proper controls, cable logging of steep slopes results in less soil disturbance than the conventional method of tractor logging. Benefits associated with logging of steep slopes include creating a diversity of habitats for wildlife and maintaining the timber resource in a healthy growing condition. The McKnight burn created a much more severe change in micro-climate and the general environment of the area than will be created by steep slope logging.

Timber harvest on steep slopes has been reduced in the modified Proposed Action Alternative, but some steep slope logging will help meet the Plan objectives for several resources. Please see the steep slope discussion in the Proposed Action Alternative Summary of Change.

MANUAL SIMON

3215 Carter
000257 Truth or Consequences
New Mexico 87901
[505] 894 3826

10/8/85

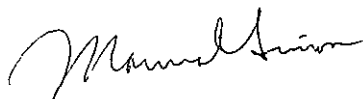
Forest Supervisor
Gila National Forest
2610 N Silver St.
Silver City, NM 88061

I wish to state my feelings about the "Gila National Forest
review
Draft Plan and Environmental Impact Statement" process.

1. It will reduce oxygen in the environment.]1
2. It will eventually change the climate.]2
3. It will destroy the Gila as we know it.]3
4. It will add to the defoliation of the state of New Mexico.]4
5. It will destroy wildlife.]5
- 6 In reference as to what it can do just check "outh American
Rain Forest and the drought in the continent of Africa.

Don't let this happen to the Gila National Forest.

Sincerely,



257-1

The practices outlined in the modified Preferred Alternative will cause basal area to increase over time. In addition, the forage capacity will increase over the current condition. This will amount to an increase in vegetation and therefore should increase rather than decrease the oxygen supply.

257-2

By utilizing the Best Management Practices, which require the re-establishment of timber and grasses following harvest or disturbance, the Modified Preferred Alternative should do nothing to change the climate.

257-3

The majority of the practices outlined in the Plan have been used on the Forest over the last 50 years. Of the approximately 698,000 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. A list of the specific areas affected can be found in the Proposed Action Alternative Summary of Changes in front of the public response document.

257-4

As mentioned previously, the practices outlined in the Modified Preferred Alternative will do nothing to add to the defoliation of the State of New Mexico. If anything, the Plan should help reduce the possibility of such an event occurring.

257-5

The Modified Preferred Alternative provides for an increase in habitat diversity and condition. This will provide for increased populations in both game and non-game animals and birds.

000250

U.S. FOREST SERVICE
SILVER CITY, N.M.

1204 HALL ST
LAS CRUCES, N.M. 88005
October 7, 1965

DATE RECEIVED:

Forest Supervisor
Ala National Forest
200 North Silver Street
Silver City, N.M. 88001

Dear Forest Supervisor:

I am writing in regards to the proposed Ala National Forest Plan. I am strongly opposed to the construction of the Connor Dam on the Ala River. The Ala River is the last free-flowing river in New Mexico and for this reason among several others, including the apparent destruction of 25 miles of natural habitat, the river should be maintained. I also disagree with allowing large areas of forested areas to be open to off road vehicles, such a practice will cause rapid degradation of forest habitat and introduce a severe disturbance factor in wildlife. The proposed Ala National Forest Plan will close all areas to off road vehicles except in designated small portions of the forest. The plan for the Lincoln National Forest also calls for timber harvest which requires road construction, but these roads will be kept at a minimal and not open for

258-1

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.

258-2

ORV use is recognized as a legitimate form of recreational use. The Plan addresses this issue by permitting such use to occur as long as it does not produce resource damage. ORV use has not been a big problem on the Forest in the past. Much of the Forest is not accessible to ORVs. In the event ORV use begins to cause resource damage, the affected area will be closed to ORV use. The wilderness Act of 1965 prohibits the use of motorized equipment within the boundaries of a classified wilderness.

258-3

education in comparison with what it is
essential to keep off road vehicles. not of wilderness
areas

I have been attending New Mexico State University
and living in NM for over 4 years and I
have come to appreciate the natural beauty and
wilderness areas of this state. I urge you to
maintain the White National Forest as a natural
a condition as possible. I am a native of
Massachusetts, a state in which there is little
natural habitat left and the western states
go the way of the western states before we
realize what we have done. I understand
that a Forest Plan is necessary for the White
National Forest, but a plan that allows for
intensive timber harvest, massive road construction
and limited recreation thus is hardly a plan
that will protect our natural resources

Sincerely yours,

Wendy J. Puma

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 modified Proposed Action Alternative projects a timber harvest
of approximately 30 MMBF in all decades. This change results in a 57%
reduction in the amount of roads that would need to be constructed, and
results in less development of the existing unroaded areas on the Forest.
Only 3 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 in the front of the public comment
document for a more complete description of the changes.

We feel that these changes will result in balanced use of the Forests
resources.

LETTER 259

000259

2020 Boise Drive
Las Cruces New Mexico 88001
October 8 1985

Gila National Park Supervisor
Silver City,
New Mexico

Dear Sir,

My family and I strongly protest the proposed plan for the
Gila National Forest. To deface such beautiful and wild
land with miles of roadway is wrong. Please reject the
plan and keep the Gila Wilderness a wilderness.

Very sincerely,

Richard J. Bagby
Mrs. Richard J. Bagby

FOREST SERVICE RESPONSE TO LETTER 259

259

The Proposed Forest Plan does nothing to affect the three wilderness area classifications on the Gila National Forest. All timbering, road construction, etc., mentioned in the Plan are proposed for areas that do not have wilderness classification. 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 nonwilderness 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.

LETTER 2 6 0

000260

701 E Street
Silver City, NM 88061

October 8, 1985

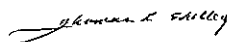
Mr. Kenneth C. Scoggin
Forest Supervisor
Gila National Forest
Silver City, NM 88061

Dear Mr. Scoggin:

Subject: Reply to 1980 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

Enclosure

FOREST SERVICE RESPONSE TO LETTER 2 6 0

260

260-1

This comment is the same as letter 58. Please see our response to
letter 58.

COMMENTS ON THE 1985 PROPOSED
 U.S. NATIONAL FOREST PLAN AND
 SUMMARY IMPACT 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 alternative weighed with this purpose and the public trust in mind.

Plan Page 5, Overview and Issue

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 deny 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 alternative derived therefrom.

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 in debate 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 while 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 resource 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 area 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 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.

Plan Page 6, FIS 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 FIS 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 Bursum Road, Willow Creek, Wall Lake Road, the Outwalk.)

Vandalism is increasing at an alarming rate. These issues are not adequately addressed in the plan and FIS. 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, 20-243 FIS Page 5, 22 Wildlife & Fish

I believe current levels of wildlife are underestimated in some instances, such as management areas 7A, 7F and 7I. There is considerable concern for the lack of improvement needed for better wildlife and fish management and increased productivity.

Plan Page 8, FIS 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 FIS Pages 7, Wilderness
Plan Page 17 Facilities Plan Page 17, Land & Special Uses
Plan Pages 12, 292 Cultural Resource

Current management under wilderness status is proving to have serious adverse effects not addressed in the Plan and FIS. Many areas are over-impacted with firepit 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 enter 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 system, 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.

General Comment

The Plan and FIS 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.

000261

DATE RECEIVED
2485

DATE RECEIVED

Let me tell you from first hand experience that roads into an area greatly reduce the quality of a backcountry experience. This is due to both the number and type of people that will visit the area. People who are willing to hike in are fewer and are more careful not to impact the environment than people who come in by automobile.

Finally it is my opinion that some areas that deserve Wilderness Status protection are not given this protection by the new management plan. Two areas in particular are the Lower San Francisco Canyon, and Mills Hole. Wilderness designation is the type of protection that allows me to rest in the knowledge that the best areas are safe.

261-1

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 95 MMBF per year in the first decade. The volume was projected to increase to approximately 48 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 67% reduction in the amount of roads that would need to be constructed, and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes. The change summary also contains our rationale for not recommending the wilderness study areas for wilderness.

261-2

As can be seen from the effects on unroaded areas mentioned above, the modified Proposed Action Alternative does not log all of the virgin forests on the Forest. Only 262,000 of the 432,000 suitable acres on the Forest would be managed for a sustained yield of timber. Some areas that have not previously been harvested would be harvested, but much of the future timber output from the Forest would come from areas where timber harvest has taken place in the past.

261-3

The Plan calls for the possible use of herbicides to remove plant competition or undesirable species in areas scheduled for regeneration or areas of woody plant invasion. Chemical control is but one of the methods available to accomplish this task. Other methods include mechanical or prescribed burning. The method selected will be the most cost effective for the site to be treated and will consider the effects on the environment.

261-4

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). Erosion mitigation measures will assure that soil loss will not exceed soil tolerance levels and will not result in loss of long-term productivity. Watershed condition should actually increase over time.

261-5

Timber sale receipts are determined through competitive bidding on the open market. The price bidders are willing to pay is directly related to the economic conditions prevalent at the time the sale is put up for bid. Since timber sales are utilized to provide benefits to other resources, the effects of the sale cannot be evaluated totally from reviewing the dollars received from stumpage. Timber sales can be used to increase wildlife habitat diversity and often result in more forage for wildlife and domestic livestock. These are additional values that are derived from the sale program which are not considered in the appraisal process.

261-6

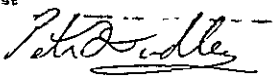
We reevaluated our nonwilderness recommendation for the two wilderness study areas and feel that the nonwilderness recommendation is still the appropriate decision. The rationale for our recommendation is included in the Proposed Action Summary of Changes.

LETTER 261

FOREST SERVICE RESPONSE TO LETTER 261

Please do all you can to resist the attempts of the timber
industry to log the virgin forests of the Gila. Please preserve
roadless areas and provide wilderness protection to the many very
special areas in the Gila Forest.

Since my



261-7

We feel that many of the changes that have been made in the Plan reflect the types of concerns that you express. Please review the Proposed Action Alternative Summary of Changes for a summary of the changes that have been made as a result of the public comments. We feel that the modified Proposed Action Alternative represents a good balance.

COUNCIL OF AGRICULTURE, NATIONAL ECONOMICS
 DEPARTMENT OF FORESTRY, AGRICULTURAL SCIENCES
 B. 49, 1/18 Cruz, No. 1, 101
 P.O. Box 1000, 101

October 17, 1967

000262



Kenneth C. Scoggin
 Forest Supervisor
 Gila National Forest
 2610 N. Silver Street
 Silver City, NM 88061

Dear Mr. Scoggin:

I appreciate having the chance to review the Proposed Gila National Forest Plan and the draft FIS I submitted a hand-written draft of this letter to Forest personnel on October 17th in Silver City, but I feel that this typed version would replace the original letter in order to improve readability. The Plan and FIS contain a wealth of information and I certainly understand better now the variety of conflicting resource uses which must be balanced in the plan. I feel the proposed plan provides a good range of alternatives to consider and will permit future decision makers to understand the trade-offs between various management emphases. In general, I would like to have seen a stronger emphasis in the proposed plan on wildlife and developed recreation because projected future use by Period 5 would greatly exceed the MRVDS provided by the preferred alternative (PA). I am also concerned about the impact of increased timber harvest on steep slopes on (1) soil loss rates and (2) potential flood damage to aquatic habitats and human developments. It would seem that increased timber harvest and livestock grazing in excess of capacity could be especially damaging to watersheds already in unsatisfactory condition. The potential for floods having long-lasting negative impacts on streams with game fish populations appears greater during periods of above average precipitation such as have occurred in recent years.

The remainder of my more specific comments will be confined to fish populations and aquatic habitats.

262-1

We certainly appreciate your concern about the effects of any resource use which may be in excess of capacity. The effect over utilization of any resource on watersheds, riparian habitats, and fisheries resources is fully recognized.

Data used in the Forest Plan was keyed to establishing a "long term sustained yield" capacity for each resource based on vegetation, soil, topography, and other inherent capabilities (watershed condition etc.) of each land area.

The actual capacity for a given resource in a specific management area varied by alternative contingent on the amount of emphasis placed on that resource. Conflicting uses emphasized in a given area generally lower the capacity for each competing resource. Complementary uses may enhance capacity for each other in a given area.

For example, the projected capacity of livestock forage use is lower in areas where management emphasis is placed on key habitat areas and where higher wildlife forage allocation levels are emphasized. Livestock capacity is higher in those areas where livestock grazing use is emphasized along with complementary timber or fuelwood harvest which reduces overstory canopy cover.

Existing resource data on vegetation, soil erosion potentials, topography, watershed condition, wildlife habitats, timber suitability, recreation, livestock capacity, etc. were used in projecting resource outputs in individual management areas. All projections are based on the capacity of each land area to support that individual resource level along with the interactions between other emphasized resource uses.

The original Proposed Action Alternative would have resulted in the sawtimber harvest of approximately 26 MMBF per year in the first decade, with an increase to approximately 48 MMBF by the fifth decade. As a result of the comments received, demand projections and benefit values have been revised using more recent data. The level of steep slope logging has also been reduced to approximately 5 MMBF per year for the first decade. Please refer to the Proposed Action Changes Summary located at the beginning of this document for additional information regarding modifications made to the Proposed Action Alternative.

In general, I feel, grazing management to reduce impacts on the riparian zones and watersheds should be given a high priority in streams with existing, and potential sport fisheries. My recent observations of the flood damage to the floodplain caused by a "1-in-100 year" flood in McKnight Creek in 1984 may clarify my recommendations. Despite many years of what I felt was good grazing management in McKnight Creek, the 1984 flood scoured the floodplain and caused loss of almost all live vegetation, extensive bank sloughing and much bed movement (downstream from the forks) in the floodplain. This

occurred despite the fact that much of the alluvial floodplain material on the banks of the stream during normal flows had been well vegetated by grass and forbs. The general lack of woody riparian vegetation in this otherwise vegetated floodplain (pre-flood) may have been a factor as willows and cottonwood saplings were not abundant in the floodplain to dissipate flood energy (note: Arizona siders are absent in this watershed). The flood also washed out most of the log stream improvement structures despite the fact that they had withstood one extreme flood in over 10 years.

My point in the preceding paragraph is that despite good grazing management within the canyon bottom, McKnight Creek was still vulnerable to floodplain damage which may require decades to completely heal. It is possible that riparian plantings of willows, etc. below the forks would have moderated this damage, but the ultimate controlling factor is probably overall watershed condition. I would encourage restraint in building physical stream improvement and stream cover structures in watersheds which are classified as unsatisfactory because of the greater likelihood of destruction by floods. In particular, stream cover structures should be restricted to headwater streams with more stable flow and in absence of other instream cover.

262-2

Riparian zones with sport fisheries potential, as well as other riparian zones will receive emphasis under the Modified Proposed Action Alternative. We agree that riparian habitats are extremely important. To clarify our management objectives, the following standards and guidelines have been added to the Forest Wide 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 emphasize riparian and fisheries 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 specific standards and guidelines from that document. These standards and guidelines give some specific long term goals to reach as far as riparian condition.

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.

262-3

We agree watershed condition is an important factor in addressing flood damage and the subsequent recovery from damaging flood events. Storm intensity and watershed gradients are also primary factors in addressing potential flood damage.

It is well recognized that even in highly stable watersheds, major storms with high rainfall occurring over a 24 hour period can seriously affect riparian zones. An example of this was evident in the upper West Fork of the Gila River during the 1978 floods. Stable watersheds will however, recover more quickly following major flood events. This is very important in stabilizing and reducing continuing damage that can occur from subsequent storms (even normal intensity storms).

The 1984 flood in McKnight creek was considered a major flood event. Between six and eight inches of rainfall occurred during a one day period. The steep upper watersheds are notably still recovering from the major wildfire which occurred in 1951. Proper livestock use does take sensitive watersheds into consideration.

Under the modified proposed action alternative, for example, livestock grazing is not emphasized in sensitive upper watershed zones of McKnight creek. This is in part to aid stabilization of upper watersheds previously affected by wildfire. It also enables more efficient range management within areas of higher potential found within lower zones of this management area.

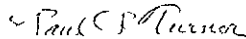
It is probably more cost effective to first improve watershed and riparian conditions by managed grazing and establishment of satisfactory stands of woody riparian species (e.g. by plantings) before resorting to costly stream improvement structures. I would also recommend a moratorium on repairing existing stream improvement structures or building new ones in Main Diamond Creek until the effect on the Gila trout population of closely-spaced structures (e.g. 50 to 200 feet apart) can be evaluated. The 120 or so existing structures in this 4 miles of stream may be too many already for maintaining a desirable length and age distribution of Gila trout. I suspect the 1/0 structures proposed in the PA would be excessive.

Another recommendation would be the establishment of several study areas on streams with "resident trout" indicator species. Preliminary baseline monitoring of rainbow and brown trout populations over several years would allow a better understanding of the impact of changing resource management practices (e.g. timber harvest and road construction, grazing, prescribed burns). I am presently unaware of any good baseline data on established trout populations in the Forest (other than Gila trout). This type of monitoring should combine standardized fish sampling procedures by New Mexico Game and Fish, etc. with detailed habitat evaluations within permanent sampling areas by the Forest Service. It would be desirable to establish study areas with a combination of the following variables: brown trout, rainbow or hybrid trout, both satisfactory and unsatisfactory watershed conditions, both satisfactory and unsatisfactory riparian conditions, elevation and maximum flows should also be considered. I realize my suggestions would be contingent on obtaining additional funding by both the Forest and Game and Fish, but the latter is in better position in this respect than in previous years.

The formation of an interagency work group to make recommendations on a monitoring program would be desirable. This group could also make habitat management recommendations on the existing trout lakes on the Forest. Eutrophication of these lakes could probably be moderated with modified management practices. I expect greater fishing pressure on these accessible fishing waters in the near future, especially if they can be improved (e.g. Quemado campground) and the fishing enhanced by increased stocking and better habitat management. I believe consideration for construction of new fishing lakes on the Forest (e.g. for a Gila trout lake fishery) should await maximum enhancement of existing lakes, but I feel that fishing demand may make new lakes in the southern half of the Forest more desirable within 10-20 years. A study of fishing opportunities in the Forest would probably identify likely streams capable of sustaining increased fishing pressure. These streams could be identified for the public by the Forest and New Mexico Game and Fish. The current trends around the Gila National Forest indicate that more emphasis should be placed on increasing recreational opportunities and tourism as a long-term solution to the depressed economic conditions resulting from decreasing demand for other area products (e.g. timber, livestock, minerals).

Thanks again for an opportunity to comment on the Proposed Plan. Feel free to contact me concerning any of my recommendations.

Sincerely,



Paul R. Turner, Ph.D.
Fishery Science

PR1/ejk

262-4

We agree with your suggestions regarding riparian plantings in McKnight creek and the reduced maintenance and reconstruction level for stream improvements in Main Diamond creek. Reconstruction levels will be reduced from 170 to 100 to begin addressing stream pool/riffle ratios below the 50:50 level originally sought. (***** make correction Himbres)

262-5

Obtaining baseline habitat and/or species data is, of course, a need identified from a monitoring standpoint. Programmed monitoring under the Proposed Action Alternative will include establishment of specific sampling sites with evaluations of the variables you discussed. However specific habitat sampling at individual sites will normally not involve high intensity studies. Only those parameters needed to address significant habitat changes will be involved unless additional funding becomes available, as you briefly mentioned.

262-6

We welcome suggestions for improvement in resource management and interagency work groups can aid in this process. We feel the modified Proposed Action Alternative provides certain elements of flexibility which will enable us to address additional resource needs as they are highlighted.

Significant emphasis has been placed on management of riparian and fisheries resources under the Modified Forest Plan. It must be realized, however, that no single resource can be maximized on a forest-wide basis should it require a significant change in the projected levels of other resource uses.

Maximum resource output alternatives were developed as benchmarks and were utilized along with other resource mix alternatives to develop the Proposed Action Alternative for the Forest. This Alternative is a blend of resource output levels and Forest capabilities which attempt to address a desired mix of resource outputs identified by the Public.

263-1

DEAR SIR

000263 20 SEPT, 1985

WE, AS TUCSON CITIZENS, OPPOSE THE INCREASES
IN TIMBER HARVEST AND ROAD CONSTRUCTION IN THE GILA
NATIONAL FOREST. WE FEEL THAT IT IS DESTRUCTIVE TO
THE REMAINING WILDERNESS, UNECONOMICAL AND VERY
DAMAGING TO THE FOREST IN GENERAL. PLEASE RECON-
SIDER ALTERNATE METHODS. ALSO, WE STRONGLY URGE YOU
TO GIVE WILDERNESS DESIGNATION TO LOWER SAN FERNANDO
CANYON AND HOLE, NEAR THE MOCHILON R.M., TRISO
BOX 8 ALONG NEAR TO ARIZ. LEOPOLD WILDERNESS
SINCERELY, NANCY STEVENSON 1401 E. HENRIK, TUCSON
Jill A. Peterson.

As a result of the comments received on the Plan, several changes have been made to the Proposed Action Alternative. We feel that many of these changes respond to your concerns. 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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed, and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes. The change summary also gives our rationale for continuing to recommend the wilderness study areas for nonwilderness.

264-1

The concerns expressed in your letter have been previously addressed. Please refer to the response to letter 2.

000264

Dear Sir,

I would most seriously suggest the following proposals to expand and help rejuvenate the Lila-Alto Leopold wilderness area. Most importantly, the North Star road should be closed and the Elva and Alto joined into a single wilderness, of 900,000 acres. Many dirt and gravel, seasonal roads should also be closed in addition to removing snow and shale lake nearshore. The paved road into and development at the Lila Cliff, Devil's Den and Hot Springs should be removed and the restoration of the area should be closed, timber sales rehabilitated and development removed to establish the following wildernesses: A. Sawyer Peak 70,000 acres B. Meadow Creek 42,000 C. Lila Middle Bar 73,000 D. Hot Springs 30,000 E. Blue Range/San Francisco River 165,000 F. Mogollon Mountains 150,000 G. Tusas Mountains 275,000 H. Fraser Bar 40,000 I. Moho Peak 60,000 J. Escudado Mountain 55,000 K. Empty Rocks 20,000 L. La Montana 15,000

New roads should not be constructed, old roads should be closed and reclaimed, and vehicles should be restricted to designated constructed roads. No old growth or primary, undisturbed forest should be cut in designated lands except for fire and safety. Should be reintroduced to the Lila and other forest roadless areas of the forest. Run, then should be established in the Lila and San Francisco River. Studies should be made for returning the jaguar, ocelot and puma. For Bisturi sheep and pronghorn populations should be expanded. Livestock grazing should be phased out from the Lila National Forest over the coming decade. The entire Lila National Forest should be quieted and from overgrazing should be the Mogollon and San Francisco River. Grazing, logging, and other activities should be restricted, forage and other products should be forage in the forest. Encouraging for the Lila National Forest should be placed on reforestation, rehabilitation of overgrazed areas, repair of watersheds, erosion control, closure of roads, protection and restoration of natural wildlife habitat and other measures using only native species. Rejuvenation of the whole area to a natural fire regime should be a goal.

Should massive road closing, tell them to go away if elsewhere than Mount Rushmore. In the same vein of sanity and patterned destruction, and would be, destruction must be directed beyond Lila National Forest. Be the rancher, or even forest service personnel, destruction. What become of government that allow or encourage destruction of the symbols and living symbols as nation wilderness of a people's strength and courage. Increasingly they are transferred from awareness to ignorance, from protecting their fellow citizens, to forestry upon them. Every man, not and every woman suffering, in any way, for the gain in power or wealth of a few. Best of the common heritage and future freedom and well being of the many. (Ulitup), the horrible abuse of the common rights and resources of Latin American people by their oligarchy.

Dear Forest Supervisor - 10/31/85
 As an outdoors person and Sierra Club
 member, I strongly object to Gila
 forest plan. It represents a
 giveaway to lumber interests, a
 disregard for recreational purposes,
 and a disaster to the ecosystem.

Sydney Walter
 006260

265-1

Thank you for your comment. The concerns addressed in your letter have been
 addressed. Please refer to the response to the comments contained in letter
 011.

FILED WITH
SILVER CITY

666266

OCT 31

DATE RECEIVED

Forest Center
13415 NW Marina Way
Bethesda, DC 20821

Forest Supervisor,
Gila National Forest
2610 N Silver St
Silver City, NM 88061

October 22nd, 1985

Dear Forest Supervisor,

I am writing in support of the Earth First! alternative for the Gila National Forest, which would create a 1.3 million acre Gila wilderness. This proposal would combine the Gila and Aldo Leopold Wilderness areas and would include 12 other roadless area complexes to keep intact and healthy a mountain area with perhaps the greatest potential of any in the lower 48 states outside of the Northern Rockies to be restored to a dynamic and diverse wilderness condition. The Earth First! proposal includes valuable and badly needed suggestions for restoration of this area to a natural state for the preservation of our ever depleting populations of wildlife and natural vegetation as well as of its functioning as an interrelated ecosystem, and for the enjoyment of generations today and tomorrow who seek the purity and solace only true wilderness can provide. I have been entranced by New Mexico's wild lands and would like to return to spend time in an expanded Gila Wilderness—the larger the wilderness, the longer I am likely to stay and contribute to your state's economic well being. Please review and adopt the Earth First! Gila Wilderness proposal in its entirety. Sincerely, [Signature]

266-1

The concerns expressed in your letter have been previously addressed. Please refer to the response to letter 002.



United States Department of the Interior

 IN REPLY REFER TO:
1792 (934)

 BUREAU OF LAND MANAGEMENT
NEW MEXICO STATE OFFICE
Post Office and Federal Building
P O Box 1449
Santa Fe New Mexico 87504 1449

000267

October 31, 1985

ER 85/1421

 Mr Kenneth C Scoggin
Forest Supervisor
Gila National Forest
2610 North Silver Street
Silver City, NM 88061

Dear Mr Scoggin

In response to your request, we have reviewed the Draft Environmental Impact Statement (DEIS) and Proposed Land and Resource Management Plan for the Gila National Forest, NM. We have both general and specific comments.

GENERAL COMMENTS

The lands included in the Gila National Forest are located in close proximity or adjacent to lands administered by the Bureau of Land Management (BLM). We note that many of the issues identified in the Forest Plan have also been identified by BLM as areas of mutual concern in their resource planning efforts. Joint management approaches to addressing these issues will continue to be coordinated at the jointly held interagency meetings between the two agencies.

Waste Disposal

The DEIS did not address wastewater, sewage or solid waste disposal. The Final Environmental Impact Statement (FEIS) should discuss the types and operational efficiency of wastewater and sewage disposal facilities in the forest and assess the potential for impacts from such facilities on the human environment, particularly on ground-water and surface-water resources. Solid waste disposal practices should be discussed and the potential for impacts assessed, including those from municipal or county sanitary landfills within the Gila National Forest.

Wildlife

The DEIS states that the various topographic, elevational, and climatic conditions on the Gila National Forest (Forest) have fostered a complex diversity of vegetation types that provide a wide range of vital plant and animal habitats. Riparian areas are identified as the most important element in maintaining this diversity. While only 0.8 percent of the Forest contains riparian habitat, it supports nearly 30 percent of the Forest's wildlife species.

Of the seven alternative plans considered in the DEIS, only the proposed plan, Alternative E and Alternative F, show riparian habitat improvement. Compared to the proposed plan, riparian habitat would reflect from 1 1/2 to 2 1/2 times more improvement under Alternative E and from 3 to 20 times more improvement under Alternative F. Alternatives E and F provide significant riparian habitat improvements and should be carried forward in the development of the Forest's final management plan.

YES	NO	EXE	DEF
REP	RNGC	WFE	A/S
RS	TBT	TOE	PLS
FW	WV	RADIO	PLSC
ES	SD	TP	PA
RAI	DSP	TS	COMPU
IMP	LA	WQ	WAL
AD	ARC		CT TO
			FRES

NOV - 1 1985

GRANT

267-1

We agree that wastewater, sewage and solid waste disposal was overlooked in the Draft Environmental Statement. A discussion of facilities located on the Forest and the environmental impacts of these facilities is included in the Final Environmental Impact Statement.

267-2

We agree that riparian habitats are extremely important. To clarify our management objectives, several standards and guidelines have been added to the Forest Wide Standards and Guidelines. These Standards and guidelines are listed in the Proposed Action Alternative Summary of Change located in front of the public comment document.

In addition to the standards and guidelines referenced 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 riparian condition goals.

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 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.

We note that the majority of the 25 indicator species used in analyzing impacts to fish and wildlife habitat are associated with riparian habitat. Table 42 suggests that the habitat impacts of the alternative plans on these species' habitats would decline an average of 2 percent under the existing Forest management direction, improve 13 percent under the proposed Forest Plan, and improve 124 percent under Alternative F. In addition, to providing the greatest improvement in riparian habitat, Alternative F would result in the most rapid balancing of grazing use with carrying capacity, the most stable levels of native species diversity, and the highest Benefit/Cost ratio for Present Net Value. Present Net Value is a measure of the net economic benefit to the public which, as a purpose of the Forest management plan, is to be maximized over the long-term.

The Forest Service should be commended for attempting to balance permitted grazing use with range capacity, a balance which has been tried but never accomplished to date. Apparently, this objective is to be accomplished by improving range capacity through the creation of additional forage acreage. Logging, controlled burns, and stock watering developments would be employed to improve range capacity. The DEIS states that present permitted grazing use in the Forest is 18 percent above its current carrying capacity. Since livestock concentration around water sources/riparian vegetation is well known and stated in these documents, grazing pressure is considerably higher in the Forest's riparian habitat. The effects of this can be seen through increased soil erosion, increased sedimentation and turbidity in riverine habitat, reduced riparian habitat quality and river bank instability. Permitted grazing use under the proposed plan would be increased significantly over the existing management plan. We are concerned that this increase in grazing would continue to adversely impact riparian vegetation and associated aquatic and terrestrial wildlife species unless protective measures such as fencing are implemented.

The Forest's efforts to protect important riparian habitat through coordination and improvement seem vague and of questionable effectiveness. The proposed fish and wildlife inventories and future habitat planning are admirable but little "on-the-ground" improvement would occur unless they are integrated into management directives. We would suggest that general habitat areas be identified in your proposed plan and measures to protect and enhance any critical or damaged riparian habitat be listed for each area. Riparian habitats that would qualify include those adjacent to fragile and highly erodible soils, habitats used by Federal and State listed or proposed species and areas of high species diversity, particularly those subject to logging, grazing, road construction, habitat improvement, and other land management practices.

Among the five parameters chosen by the Forest to depict fish and wildlife habitat conditions/values, only one (herbaceous cover and forage) shows improvement under the proposed Forest Plan; all other habitat parameters decrease or remain unchanged from the current management plan. The basis of habitat diversity/carrying capacity on only herbaceous cover and forage seems limiting, particularly in view of the great diversity of fish and wildlife resources that depend on the Forest's habitats for survival. As a result, only selected big game and fish species would benefit from the increases in habitat diversity, carrying capacity and habitat improvements expected under the proposed Forest Plan.

267-3

We agree that Alternative F, as stated, has the highest PNV, 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 some of 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. Present Net Value is a measure of the net economic benefit to the public but does not include nonpriced benefits that contribute to net public benefit. The purpose of Forest management is to maximize net public benefit over the long-term, not net economic benefit. We feel that the modified Proposed Action Alternative provides for a higher level of net public benefits than Alternative F.

267-4

You state that permitted numbers would increase "significantly" in the proposed plan. This is not the case. Presently there is 383,000 AUMs of permitted livestock use on the Forest. The existing capacity is approximately 315,000 AUMs. The proposed plan projects an increase in capacity to 350,000 AUMs. Permitted numbers are projected to decrease to 350,000 AUMs. We feel that this is the best way to continue to improve the range resource on the Forest. There will be an improvement in riparian areas as a result of the reductions and other management considerations in the plan.

267-5

The Forest Plan is a programmatic document designed to establish management direction. With the addition of the standards and guidelines referenced in our response to your concern number 1, we feel that direction is adequate to provide for improvement of riparian areas. The specific measures that will be used to provide the level of improvement indicated in the plan will be determined when specific project implementation plans are developed. The project implementation planning level is the proper level at which specific management practices needed to meet Forest Plan direction should be defined.

267-6

We disagree with your conclusion that habitat diversity/carrying capacity is based only on herbaceous cover and forage habitats and that only selected big game and fish species would benefit from the increased habitat diversity expected under the proposed plan. You seem to assume that diversity can only be increased through increased acres of habitat. That is not a true assumption. If this were true, every natural vegetative disturbance on the Forest that resulted in a reduction in some habitat component acres would result in decreased diversity. Horizontal diversity is more dependent on the positioning of habitats relative to other habitats than on the total acres of habitat on the Forest. We agree that if habitat acres were significantly reduced, the distribution of habitats could suffer but this is not the case in the Proposed Action Alternative. The distribution of habitats is increased, the levels of habitat acres are maintained at relatively high levels (including such habitats as old growth), and horizontal diversity is increased. Many game and non-game wildlife species should benefit from this situation.

The Forest's proposal to close roads in sensitive areas, which we assume includes riparian habitats, should be encouraged. Off-road vehicle activity has been demonstrated to significantly impact riparian habitat in the Forest, such as along the San Francisco River. However, we note that only Alternatives L and I extend protection by restricting off-road access.

Timber management practices under the proposed plan are expected to result in a 10 percent decrease in riparian stand structure, composition, and carrying capacity. This seems to contradict other statements in these documents that indicated riparian areas would be maintained in a satisfactory condition or improved. Additional loss of riparian habitat, which has already been reduced by 90 percent in the Southwest, would not seem to be a satisfactory condition in any Forest Plan.

The DEIS and proposed Forest Plan indicated that habitat improvements would be accomplished for Federally-listed threatened and endangered species with recovery plans. The Endangered Species Act of 1973, as amended, and Forest Service policy (FSM 2600) provide direction for the management and conservation of listed proposed and candidate species. It would seem prudent for the Forest to develop management objectives to aid in the recovery, downlisting, and/or eventual removal from the Federal list of all species of concern, whether or not they have approved recovery plans.

Native Americans

We are encouraged by the concern shown in the document for protecting the First Amendment of Native Americans. We wish to point out, however, that consultations must be conducted on a continuing basis if management actions are not to infringe upon freedom of practice of Native Americans.

Pueblo Indians, in particular, are not likely to provide information on religious sites or practices unless an immediate threat is perceived. Therefore, we recommend that the Forest Service categorize actions in much the same way that a determination is reached as to whether cultural resource concerns must be met, and in such instances, initiate consultation. Actions which limit access, such as enclosures, and actions which may destroy the religious integrity and utility of sites should be considered.

We note that the DEIS does not discuss the installation of radio transmission and repeater stations, microwave facilities, etc. We understand that competition for sites for such facilities can be intense. Since such facilities usually require locations on mountain peaks with increased line of site, you should be aware that such locations are also frequently of religious concern and significance to the New Mexico Indian Tribes.

In order that such concerns be met in a consistent manner, we suggest that the Forest Service may wish to formalize both criteria and procedures. We believe, for Forest Service procedures to be consistent with a policy incorporating a Government to Government relationship, that consultation with the recognized Tribal Government should be conducted in cases where sacred sites could be affected.

We disagree with your unsubstantiated claims that "Off-road vehicle activity has been demonstrated to significantly impact riparian habitat ..., such as along the San Francisco River."

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, include 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 mainstream 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. Major floods through the canyon or of such magnitude that erosion and the loss of riparian habitat has occurred. There is no evidence that the limited ORV use of the canyon has significantly effected the natural erosion rates. If ORV use of the canyon had been demonstrated to cause significant impact on riparian habitat as you contend, the canyon would be closed to ORV use. 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 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 canyon above Mule Creek will be opened to ORV use year round.

267-8

The reduced volumes and acres managed to sustain timber outputs in the modified Proposed Action Alternative will result in less impact on riparian areas.

267-9

The process of recovery, downlisting and removal from the Federal T&E species list is accomplished through recovery plans that coordinate the species needs over a broad geographic area and not just a single Forest. That is why the Plan says that we will implement improved recovery plans. Since the Endangered Species Act of 1973 and the Forest Service manual provided direction for the management and conservation of listed, proposed and candidate species, there was no need to repeat this direction in the plan. Direction in existing laws was usually not repeated in the plan since compliance with existing laws is not negotiable. If the direction in all pertinent laws was added to the plan, the document would be much larger and more difficult to use.

267-10

Whenever a Forest project is proposed in an area that is likely to have religious significance, Native American groups are consulted. In addition, all other project information is available on request. We will continue to consider the potential religious significance of areas of the Forest and will continue to work to protect the First Amendment rights of Native American groups.

We also not that the Forest Plan does not mention Indian land claims involving lands currently under Forest Service jurisdiction. While we realize the difficulty in planning when the legislative or litigative arenas are involved, potential conflicts with Forest Service plans for disposal or exchange may result. Therefore, we feel it would be appropriate for the Forest Plan to note the existence of Indian land claims.

The plan includes archaeology as a resource that is reactive to the needs of other forest resources. They will generally only perform cultural resource surveys for earth disturbing projects. They should attempt to actively manage significant archaeological sites. This management of cultural resources can change as more sites are located and more is learned about the archaeology of the area.

SPECIFIC COMMENTS

Wildlife

Page 34, third paragraph We suggest this paragraph would more accurately reflect the previous table which shows that more, rather than "certain", alternatives result in a decrease in habitat quantity.

Page 38, Riparian Habitat, Alternative PA and B It is not clear here or elsewhere how increased grazing use, timber harvest (including cable logging on steep slopes) and developed recreation activities and facilities described in Alternative PA would result in improvement of existing riparian habitat condition and habitat diversity.

Page 42, Wilderness Study Area, first paragraph, fifth sentence It is questionable that ORV use along the lower San Francisco River Wilderness Study area is "unique", particularly since other ORV use areas are available in habitats not as rare, fragile and valuable to fish and wildlife resources.

Page 49, Table 11 It should be made clear that Recreation Benefits include wildlife-related benefits.

Page 52, Present Net Value Analysis, fourth to last sentence, lines 7 and 8 This sentence implies that there are no monetary benefits to wildlife. This may not be correct if viewed from the local economy through the value of recreation-related merchandise/services and the federal/state tax revenue they produce.

Page 57, Diversity, first sentence A definition of "diversity" may be necessary. The five habitat component list on page 34 shows a reduction of two components, no change in two other components, and an increase in only the herbaceous cover and forage component. This appears not to support the conclusion that diversity would be increased with some of the alternative plans, including the proposed forest Plan.

267-11

There are no Indian land claims involving lands currently administered as part of the the Gila National Forest administrative unit.

267-12

Standards and guidelines for management of cultural resources have been revised to assure consistency with the requirements contained in the settlement agreement entered as final judgement in the Region 3 cultural resources lawsuit (Save the Jemez, et al., v. Block, et al.; State of New Mexico v. Block and Peterson). This agreement contains minimum standards for the following: training and supervision of personnel conducting cultural resource management work; marking, protection and inspection of identified cultural resources during undertakings; damage assessment procedures and prosecution of damage claims; nomination of cultural resources to the National Register of Historic Places; inspection of National Register and other properties; site stabilization and repair; recording and data recovery for sites to be affected or destroyed; protection of cultural resources from vandals; management and conduct of undertakings; treatment of sites discovered during undertakings; and data sharing with State Historic Preservation Officers.

The settlement agreement also requires that within 18 months following October 1, 1988, Region 3 Forests will review and further address the cultural resource elements provided for in Forest Planning (36 CFR 219.24). The level of detail to be included in this effort will be defined in Regional guidelines developed in consultation with appropriate State Historic Preservation Officers. The final Forest Plan will specifically

provide for the expansion of these cultural resource elements in accordance with the terms of the settlement agreement.

267-13

We agree. The change you suggest has been made.

267-14

We agree. The discussion has been expanded.

267-15

We disagree. The opportunity to drive into a scenic river area for a back country type recreation opportunity is unique.

267-16

We agree. This has been clarified in the Final Environmental Impact Statement.

267-17

Returns to the treasury discussed in the section that you reference are direct returns to the treasury from the receipts received by the Forest Service. It is not possible to track the type of revenues that you describe.

267-18

The section you reference is only a summary. Chapter 4 contains a much more detailed explanation of the factors in each alternative that effect diversity. We do not feel that the summary section needs to be explained.

Page 59, third paragraph, Wildlife and Fish, first sentence the phrase "temporary displacement of wildlife" used here and elsewhere is a common misconception which does not apply to habitats that are at or near their carrying capacity. Under the best of situations, the proposed forest management practices would result in a temporary loss of wildlife.

Page 68, Threatened and Endangered Species, second paragraph, first sentence It should be made clear that the species included in this paragraph are State listed and not necessarily Federally-listed species.

Page 68, Indicator Species, Table 15 the symbols for successional stages should be identified.

Page 76, Soil and Water, seventh paragraph, last sentence This statement implies that there are no areas of high soil erosion that impact watercourses on Forest lands. Continuing watershed impacts or an old wildfire in the Mimbres River basin were reported in the Forest Service's Biological Assessment. In addition, several management areas on the forest are identified in the DBIS as having fragile, highly erodible soils along the Gila River (7E01), Blue Creek (J804 and J805) and San Francisco River (J817).

Page 77 Further clarification is necessary regarding how the potential to maintain and/or enhance riparian habitats can be realized and how conflicting uses can be reduced.

Page 111, Soil Loss, last paragraph, third sentence We suggest that ORV use be included among those activities that can have significant localized effect on soil losses (as well as loss of riparian habitat) as reported in consultant studies in the Forest. As implied in the Forest's Biological Assessment (see p. 76 comments), wildfires may have more than localized effects on soil loss.

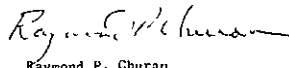
Page 123, Riparian ORV use should be included among those activities that can impact riparian habitats for the same reasons stated previously. It should be indicated if the listed habitat improvements will be implemented, and if so, where and to what extent.

Page 19, Diversity, third paragraph Current habitat diversity is portrayed as percentages of the total Forest habitat in this paragraph.

The following paragraph (p. 20) states that the proposed plan would increase plant diversity. A percentage breakdown, as shown for current habitat diversity, would be useful here to make the point and avoid the appearance of a speculative conclusion.

We hope these comments will be useful in further revision of these documents.

Sincerely,



Raymond P. Churan
Regional Environmental Officer

267-19

We disagree that the statement you reference should read "temporary loss of wildlife". This part of the summary of Adverse Effects Which Cannot be Avoided refers primarily to the disturbance effects on wildlife as a result of management activities that will occur in all alternatives. These disturbances are usually of relatively short duration and we feel that the wildlife displaced can usually move into adjacent habitat for the period of time that the disturbance is occurring. Usually habitat is available that is far enough below carrying capacity that it can accommodate additional wildlife numbers for a short period. In cases where adjacent habitat does not exist (for example elk caving habitat of raptor nesting areas) the activities are usually scheduled in periods when disturbance is not critical. The wording that you suggest may be the correct in limited situations, but we feel that the wording in the Draft is correct in most situations.

267-20

We feel that this paragraph is clear on this fact.

267-21

We agree. The definitions have been added.

267-22

We agree. The sentence that you reference has been deleted.

267-23

We disagree. This section is a description of the existing management situation.

267-24

The section that you reference already says that "Both [fire and ORVs] can have a significant localized effect on soil losses....". We can not find any reference in our Biological Assessment on the plan that refers to the wildfire in the Mimbres River basin. We feel that this section adequately describes the soil loss situation on the Forest.

267-25

We agree. ORV use has been added as a possible impacting activity in riparian areas. The section has also been expanded to provide a clearer description of what types of management actions will result in improvements in riparian condition.

267-26

The section that you reference is in the Summary of the Management Situation. This is not a description of the Proposed Action Alternative. It is a discussion of the continuation of current management direction. This section has been misunderstood by many of the people who have reviewed the plan. As a result, the chapter has been modified in the final plan document.

LETTER 268

FOREST SERVICE RESPONSE TO LETTER 268

000266

1779 W. Tucson Way
Bend, Oregon 97701
November 3, 1985

Forest Supervisor
Gila National Forest
2610 N. Silver
Silver City, N.M. 85401

Dear Forest Supervisor:

I am writing to express my STRONG SUPPORT FOR THE EARTH
FIRST ALTERNATIVE FOR THE GILA WILDERNESS FOREST. I think it
is a great idea to combine two wilderness areas and other
roadless lands into one large wilderness ecosystem. This
would provide one of the larger wilderness areas in the
country and would become more attractive to many recreation
users.

Another excellent reason for supporting this proposal as it
includes most of a complete natural ecosystem. We often
protect small areas here and there but we fail to realize
that protection of a complete ecosystem is very important to
all birds, wildlife, and plants concerned.

Please let me know your thoughts on this topic.

Sincerely,

,

Glenn Van Cise

268-1

The concerns expressed in your letter have been previously addressed.
Please refer to the response to letter 002.

B. / in Model
8764 in Tray
191 in 74

the ...
with ...
...
... with ...

with the village

You have been engaged on your part & we
checked the plan, but not taken another step to
try and make immediate. While I believe
in and support the multiple use concept,
this does seem to allow multiple use
Frank you for your consideration.

was truly,

Gertrude Mader

The Plan projects reducing the permitted numbers from 388,000 to 350,000 by the end of the second decade. This allows the permitted use to be balanced with forage production. Grazing capacity is developed through Region 3 standard analysis procedures. These procedures require a minimum of three years to complete on each allotment. The amount of analysis that can be completed in any given period is regulated by the number of personnel that can be financed to do the job. With the proposed budget to implement the plan, funding is not available to accomplish the balancing of use and production earlier than the period stated.

Oct 6, 1985

JAMES A. GARDINO
P.O. Box 1580
Silver City NM 88069

Dear Sir or Ms,

This letter is in response to the
Proposed Forest Plan and associated
Draft Environmental Impact Statement for
the Gila National Forest and its
associated distrib.

The only alternative mentioned in
the Forest plan that is even remotely
reasonable is alternative F. All of
the listed alternatives will continue to
degrade the quality of plant, animal
and mineral resources within the Gila.
The roadbuilding plans contained
within each of the alternatives are
simply part of the continuing spider-
webbing of the Gila with motorized access
that inevitably leads to resource degradation.

Due to the lack of truly good
choices I am just casting my vote
for alternative F which is only a
milder form of the NFS logo
"Multiple Abuse"

Sincerely Yours,

James A. Gardino
JAMES A. GARDINO

270-1

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 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 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 net public benefits than Alternative F.

270-2

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 was projected in the Draft 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. This is a 57% 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% of these roads would be closed after timber activities are completed.

270-3

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 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. A complete list of the effects on individual unroaded areas can be found in the Proposed Action Summary of Change in the front of the public comment document.

LETTER 271



FROM THE DESK OF STANLEY SPRECHER

1935 Chilton Dr Las Cruces, NM 88001

A short but sympathetic plea

to LEAVE THE GILA AS IT IS

Why spoil it with even one more
road? Rather cut out the traffic
now muddying the trout streams as
we saw over Labor Day with these
motor bikes and the likes?

Seal it off for the hiker
the fisher^{man} ^{and} even the careful hunter
willing to walk in. But don't go
after the little timber some modern
day timberbaron might want ..to ship
it off to the Orient?

Most sincerely,
Stan Sprecher

FOREST SERVICE RESPONSE TO LETTER 271

271-1

Thank you for your comment. ORV use is recognized as a form of recreational experience. The Plan addresses this issue by permitting use to occur as long as it does not result in resource damage. In the event this type of use begins to cause resource damage, the affected area will be closed to ORV use.

271-2

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 49 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% reduction in the amount of roads that would need to be constructed, and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes.

Dec. 26, 1985

To Forest Supervisor Gila National Forest 000272

I have recently studied your Forest Plan and although the public comment period is no longer open, I feel that my comments reflect a strong majority of the public's opinion - thus they may have some value to your planning process.

The conflict is a simple one. Should national forest lands be managed intensively for timber harvesting or should timber play a lesser role than in the past and amenity increase in consideration?

If the overwhelming majority of the American people had a chance to view, unimpaired, the forestry practices of the Forest Service, and then weigh them against the economics of timber, there would be no debate. You would find, almost unanimously, that all people not directly tied to wood products industries or livestock operations would reject clear-cutting, cable logging on steep slopes, high-level grazing, and silviculture practices that include herbicide use.

Most people truly enjoy the natural qualities of the national forests, and would gladly agree to a reduction in timber output to keep their forests uneven-aged, diverse and "natural".

My personal opinions are strong. I oppose all road building in present roadless areas on the Gila Forest. I suggest a large reduction from current levels of timber production.

I suggest that clear-cutting be limited to emergency situations - that selective logging be the preferred method for all major timber sales.

272-1

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 modified Proposed Action Alternative projects a timber harvest of approximately 30 MMBF in all decades. This change results in a 57% reduction in the amount of roads that would need to be constructed, and results in less development of the existing unroaded areas on the Forest. Only 3 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 in the front of the public comment document for a more complete description of the changes made between the draft and final planning documents.

272-2

The Shelterwood silvicultural system is the primary system proposed in the Plan. Clearcuts are used only to create wildlife openings or in an emergency situation as you suggest.

I oppose any increase in grazing. Cattle should, along with sheep, pay for all costs associated with livestock use, including damage to stream banks, increased erosion, all necessary improvements and administration. Fees should show a profit for the taxpayer or grazing should be eliminated.

Although I only visit the Gila Forest periodically, the knowledge that its resources are being abused in the name of management has a serious impact on me and my family. We sincerely urge you to remember that you can provide a continuous supply of lumber from forest lands at a much lower level and meet all legal requirements.

By preserving roadless areas, reducing harvests and grazing, and by eliminating clear-cutting, the Forest Service has a chance to show the public that you do listen, and that public response is not just taken paperwork to be ignored.

GILA NATIONAL FOREST
Silver Pk. " " "

11/30/85

DATE RECEIVED

Thank you,

A A Buckley
PO Box 476
Middletown, Ca 95346

272-3

The Plan projects reducing the permitted AUMs from 383,000 to 350,000 by the end of the second decade. This allows the permitted use to be balanced with forage production.

The price that permittees pay for the privilege of grazing is determined by Congress. Fees cannot be adjusted as a result of the Forest Plan.

272-4

In response to public comments, 87 percent of the existing unroaded area on the Forest would still be unroaded at the end of the first decade. Timber harvest has been reduced, and permitted livestock numbers are projected to be reduced over time. Clearcutting is only proposed to create wildlife openings and would be a very small percentage of the timber harvest activity on the Forest. We feel that we have been responsive to the suggested changes by the public.

LETTER 273

FOREST SERVICE RESPONSE TO LETTER 273


7 Nov 15, 85

Forest Supervisor
Gila National Forest
Silver City, New Mexico
NOV 18 '85
000013

DATE RECEIVED

Please consider adopting the
Earth First proposal for a 1.3 million
acre Gila Wilderness. See enclosed
map. These areas are highly qualified.
I operate a 7 acre farm nearby
on the San Francisco River.

James V. Lewis

 James V. Lewis
3401 Mars Rd NE
Albuquerque, NM 87107

273-1

The concerns expressed in your letter have been previously addressed.
Please refer to the response to letter 002.

LETTER 274

FOREST SERVICE RESPONSE TO LETTER 274

Casper WY 82601

January 19, 1986

Forest Supervisor

Gila National Forest

2600 N Silver Street

Silver City, NM 88061

000274

GILA NATIONAL FOREST
SILVER CITY, New Mexico

JAN 23 '86

DATE RECEIVED

Dear Sir:

I am writing in regard to wilderness in the Gila National Forest. The Gila has in it the first area to be designated wilderness in the US - an accomplishment to be proud of. The way that it has been managed since wilderness designation, however, has not to be allowed. That is why I support Earth First's alternative for the Gila.

The Forest Plan and OLS for the Gila is basically the same one that has been prepared for all the National Forests. Man logging, new roads, and changing a relatively undeveloped open pine and brush country region into a managed, human centered landscape, one called for. We already have developed land in the form of Florida, Ohio, and California. We don't need more of it in our western National Forests. They are needed and called for large undeveloped, wild, pristine, PREDATOR systems.

The Gila has great potential to be restored to a diverse, dynamic, healthy wilderness. Earth First's proposal would accomplish that. Please support it.

Sincerely,
Martie Croxson

274-1

Several changes have been made to the Proposed Action Alternative. Please see the Proposed Action Alternative Summary of Changes in the front of the public response document.

274-2

Please see our response to the Earth First Letter [Letter number 2].

LETTER 275

FOREST SERVICE RESPONSE TO LETTER 275

GILA NATIONAL FOREST
Silver City, New Mexico

NOV 21 '85

DATE RECEIVED

000-000275

1612 Upas Street
San Diego, California 92103
November 11, 1985

Forest Supervisor
Gila National Forest
2630 N. Silver Street
Silver City, New Mexico 88061

Dear Forest Supervisor

We feel a very strong sense of oneness with this country and at the present time we feel a deep concern for the fate of our wilderness areas. There seem to be many ways to destroy them and eliminate them altogether and a tremendous amount of energy going in that direction. It is our commitment to speak out for the preservation of the wilderness areas and it is for that purpose that we write you this letter. We understand that Earth First! has proposed an alternative plan for the Gila National Forest that would restore it to the magnificence that is possible for our planet. It is our request that you support this Earth First! plan and allow a healing that is much needed in our wilderness areas. It would allow you to get on with the job of protecting and preserving rather than destruction.

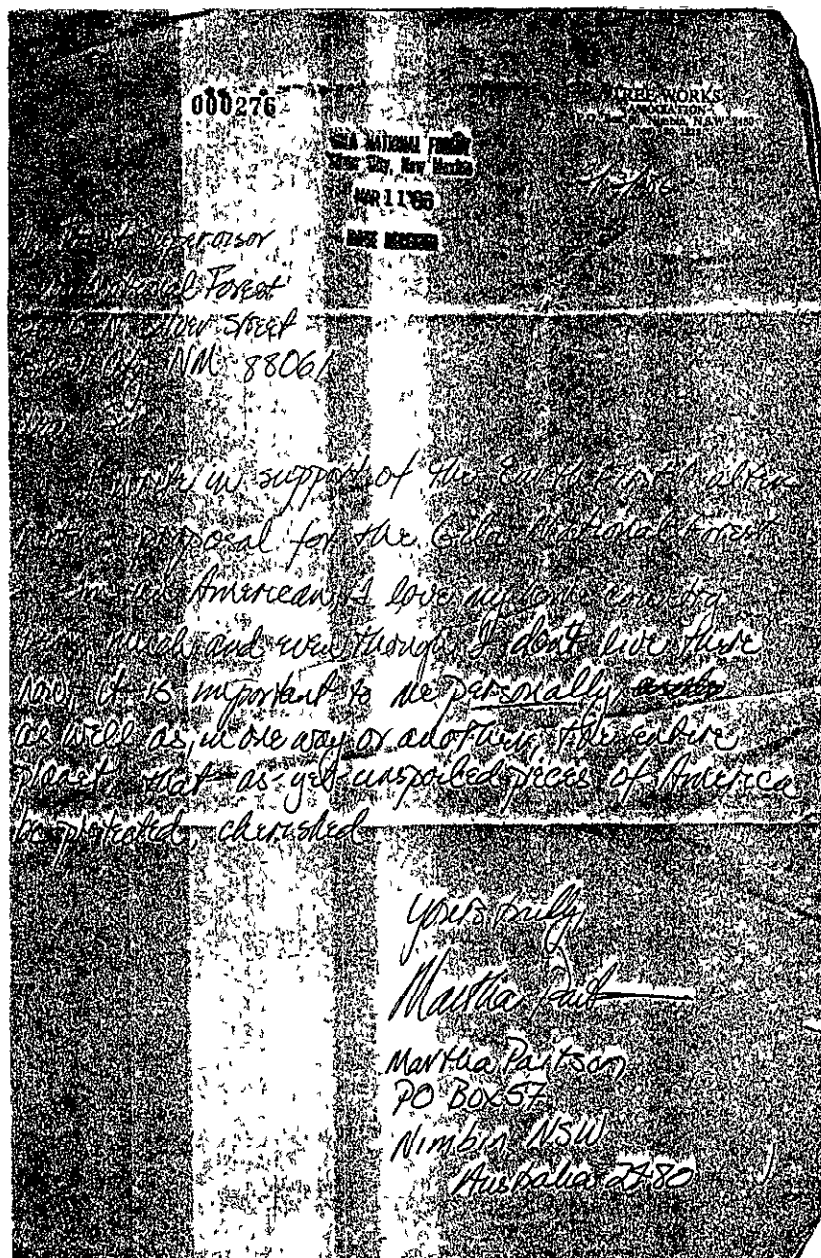
Sincerely,

Marilyn and Jeffrey Quinnell
Jeffrey A. Quinnell

Marilyn and Jeffrey Quinnell

275-1

The concerns expressed in your letter have been previously addressed. Please refer to the response to letter 002.



276-1

The concerns expressed in your letter have been previously addressed.
Please refer to the response to letter 2.

PERMITTEE MEETING

A meeting of the Gila National Forest Grazing Permittees and Forest personnel was held at 1100 A.M., October 4, 1985 in the Gila National Forest Conference Room, 2610 N. Silver Street, Silver City, N.M.

Gerry Engel opened the meeting by stating that there had been a couple of other meetings with the grazing permittees, primarily to answer questions. He stated he would have a session today where questions could also be answered. In addition, the Forest Service would take people's comments that would be made a part of the record as part of the response program on the E.I.S. I would like to go through a little introduction as I have done in previous meetings and then you can go through a question and answer session. After that I will record the comments that people had. In this manner I will not get the comments confused during the question and answer sessions. If people have comments during this time, they could make them again later on. Gerry asked if that would be ok?

Art Tackman stated that he had mentioned to Mr. Scoggin that they were not interested in any presentation of the E.I.S. or the Plan. He assumed that Gerry represented the Forest Supervisor inasmuch as he had requested a meeting with the Forest Supervisor.

Gerry Engel stated that, "yes, he was representing him".

Art Tackman started off by making a short statement with a copy he had given Gerry Engel. I then would like to open it up to comments and whatever objections the permittees have so that it will be a matter of record.

Gerry asked Art Tackman if the statement he was making now was the comment he would like the Forest Service to respond to as part of the record.

Art Tackman stated, "not necessarily respond to. I want to make a statement that will be a matter of record."

Art Tackman stated that they did not expect a response inasmuch as their comments were so far reaching that they would involve policy of the Forest Service, methodology used in the development of these documents, etc. We had asked for this meeting prior to the expiration of the comment period on October 8, 1985, in order not only to make their comments but to voice their objections to many of the proposed actions recommended in the Proposed Gila National Forest plan, and also to:

1. Object to the methodology used in the development of the DEIS and the Plan.
2. Object to the complete disregard by the Forest Service for the provisions of Section 8 of the Public Range Lands Improvement Act in developing the grazing capacity for permitted livestock AUMs in the Proposed Gila National Forest Plan.
3. Object to the complete disregard by the Forest Service of the economic consequences to local communities and grazing permittees. In a general comment, it is absurd and alarming that the Forest Service after five years of labor by technical and professional staff members, turning out three documents - one of 350 pages and one of 328 pages, expect non-technical permittees, whose life work and income are directly affected to make pertinent comments within a 4-1/2 month period, May 24, 1985 to October 2, 1985. The permittees only recourse was to obtain professional help in the analysis of the subject plan. As president of the Gila National Forest Permittee Association, Art Tackman joins with other representatives of the livestock industry in New Mexico to fully endorse and support analysis and comments sent to the Forest Supervisor under their letter of September 27, 1985. This meeting would allow permittees of the Gila National Forest to personally voice their own comments and objections to the Proposed DEIS. [These concerns are addressed in our response to the New Mexico Department of Agriculture comments that Mr. Tackman referred to: Comment #001].

PERMITTEE MEETING

Gerry asked if there were any other people that would like to make comments at this time.

Walter Biebelle stated that he had some questions. [1] Biebelle felt that the Forest's opening statement indicated to them that the Forest proposed no changes in their present plan.

Gerry stated that this was not correct. It is a draft environmental statement and a draft plan and should be perceived as such. Engel stated that, "If the Forest ends up with the same plan that we have right now in the draft, it would greatly surprise me". I feel that there was no way that it would be the same.

Walter Biebelle asked if this proposed plan would eliminate the allotment management plans which have been instituted and which have been completely overlooked in this draft proposal?

Gerry stated it would not. Any indication the Forest Service may have given in the plan that indicated any increases or decreases in terms of permitted numbers would be verified through standard allotment procedures. As a result of going through those procedures, there could be some changes in what is said in the draft plan that we have now or in the final that we come up with after going through the public involvement procedure. The Forest Service will be going through the stand allotment analysis procedures to determine exact numbers. What the plan really does is set the management direction. The direction that we will be managing toward in different areas is to try and resolve the different kinds of conflicts that we are dealing with on the Forest.

Walter Biebelle asked if management direction meant the elimination of livestock?

Gerry stated that it did not mean the elimination of livestock. The management direction indicates how intensively we will manage livestock, and how intensively we will manage other kinds of uses on different areas of the Forest. This is really what the management direction says.

Walter Biebelle asked what the term "we" meant?

Gerry stated "we" meant the Forest Service.

Walter Biebelle asked if this meant no financial involvement other than the pay and the job which is assigned to them by the headquarters?

Gerry stated that he did not really understand the question, whereupon Biebelle stated that the question really did not need an answer.

Walter Biebelle now introduced the subject of "Range Improvement Monies". He asked if their direction was primarily not for livestock but for wildlife?

PERMITTEE MEETING

Gerry stated, "no". We estimated that if we continued the current management direction, what would happen was that we would continue to get about \$390,000 - \$383,000, something like that. We estimated that if we continued current management direction, because of the deterioration of the facilities, range improvements, stock waters, fences, etc., because there presently isn't enough money in the budget to maintain all those facilities, that the capacity on the Forest would decline over time. That decline would be followed by a decline in the permitted numbers. What we did on the Proposed Action Alternative was that we tried to boost somewhat these range dollars in order to maintain range facilities on the areas that provided the greatest opportunity for maintaining animal unit months of grazing. We did this so that we wouldn't drop any further than we had to with reasonable budget considerations. On the Proposed Action Alternative, there is somewhere in the neighborhood of \$190,000 more in the range part of the budget than there is in the Current Alternative. Those dollar increases in range result in decreases in other resource areas because we do have a budget constraint. We can't go above some level for all activities put together. Range budgets we increased to a level we thought was appropriate considering all the rest of the demands on the National Forest and all the rest of the demands on how we use those budget dollars. Part of those demands do relate to wildlife and there is an increase in wildlife, but it is not an increase that meets the demanded level for wildlife/recreation. In other words, the Proposed Alternative does not meet the demanded level for anything. What we have is demand for more things on National Forest than we can really supply, and what we are trying to do is come up with one appropriate mix that provides some level of use for all the different kinds of activities. The Proposed Action Alternative won't provide the maximum level of use for any of the activities. For instance, we are getting comments that are saying that 50 percent of the forage on the Forest ought to go to wildlife. Right now, as far as the plan goes, in the first decade there are about 77,000 animal unit months that are going to wildlife and 390,000 that are going to domestic livestock. At the end, even with an 80 percent increase, there is somewhere in the neighborhood of 140,000 that are going to wildlife and there are still 350,000 that are going to livestock. This is not a total emphasis on wildlife, by any means.

Walter Biebel asked for one more verification. If I am interpreting correctly what you just got through saying, the Forest is receiving more money and more benefits from wildlife than they are from livestock grazing by the virtue of the fact that they consider, per person on National Public Lands, benefiting this service by \$21.00 per day, where livestock only benefits it by \$7.00. If this is true, show us on the board how the Forest Service came up with this figure based on the fact that, up to date, it is free access to the Forest to hunt, the game belongs to the State of New Mexico, and explained to us how the Forest Service arrived at a \$21.00 a day value per person hunting on public lands.

Gerry stated that all he could put on the board was the \$21.80. This value was generated at the Washington Office level during what is called the Resource Planning Act process and is based on willingness to pay. The value is the amount that someone would pay if they were being charged to use the National Forest lands. Gerry stated that he felt that what was happening was that those values were being blown a little out of proportion because the value by itself is not what is dictating the management of the National Forest. We didn't go with just those values that were being considered. If we had, range would have gone all the way down to the bottom level, it would have gone down to 283,000 AUMs. We basically told the economic model that we did not want it to go down that low - that it couldn't go any lower than 350,000 AUMs. So, we maintained those AUM's up there at some higher level than they would have gone otherwise. In terms of the contributions to the Forest Service, we don't receive any dollars from those wildlife/recreation visitor days that are going on out there now - the people that are hunting and fishing, etc., but we also don't have any activities on the Forest that are paying their own way. The cost is higher on everything than we are receiving back. It really does not become as much of an issue of dollars as it is an issue of what kind of a mix should we end up with at the end of this thing to help resolve some of the conflicting demands that we have.

Francis Biebel asked how much did it cost to write the proposal?

PERMITTEE MEETING

Gerry stated that this was the third time he had gotten that question. We got it up at Luna and the first time we answered it, we thought it was somewhere in the neighborhood of two million dollars, but it was about half of that - it was about one million dollars.

Mrs. Biebel wanted to know if the Forest Service is charging that to livestock.

Gerry answered, "no". It came out of appropriated dollars. It did not come out of Range Betterment Funds or any of those kinds of things. Part of the dollars came from range appropriations, but not range betterment funds. Part of it also came from wildlife and recreation, fire, etc. It was funded by everything together because it is a plan to try to resolve all of those issues and not just one issue or another.

Walter Biebel asked what percentage of personnel in your offices are concerned with grazing, both wildlife and livestock, and how are those monies charged to the operation, to what department, or what fraction or phase of the operation?

Gerry stated that there were eight districts on the Forest and there are two Range Conservationists on seven of the districts and one on the other district. There is one on the Wilderness District that works with range part time on the one allotment they have. He said he did not know exactly what the total number of employees is, but range would probably be 10 percent. As far as the budgeting process is concerned, we get our budgets primarily by functional areas, dollars that are earmarked for range and dollars that are earmarked for timber and dollars that are earmarked for recreation. This is the way we spend those dollars. This is one of the things we are going to need to deal with. How well we are going to implement the plan is going to depend on how well we're able to get dollars in the areas in which we are asking.

Louis Oliver expressed the opinion on the wildlife issue Gerry had previously discussed was totally irrational. He said that Gerry spoke of "X" number of animal unit months for wildlife, "X" number of animal unit months for livestock, and neither the livestock or the wildlife read these reports. When a cow, deer or elk is hungry, they eat, and when they are through they quit - it's as simple as that. There is an abundance of feed out there and he felt that we did not have any wildlife or livestock that is suffering from lack of feed - there is nothing starving out there. He felt that the problem with the wildlife, which should not be loaded onto the rancher, is with game management. If all livestock were to be taken off, wildlife would not benefit. This has been done in the past in the heart of the Gila Wilderness, and it is now one of the poorest areas in the Gila National Forest. Livestock and wildlife are compatible. He felt that the responsibility for the lack of wildlife rests with the New Mexico Department of Game and Fish. They are responsible for maintaining and caring for our wildlife, and they are not doing it; therefore, it is not fair to ask the rancher to assume this responsibility in a manner that will not work. He stated that wildlife was being decimated by predation. The Department of Game and Fish have approximately 287 employees. Of these 287, they have approximately 47 working on the ground for the care and betterment of our wildlife. This includes the fish hatcheries. The fish hatcheries are raising some fish being put out in our streams and lakes. As far as big game is concerned, Louis stated that he knew of nothing that had been done to improve big game hunting in the last 20 years. If some of the 220 office dwelling employees were out fighting predators, and if the Department of Game and Fish would buy a few hundred tons of salt each year that the ranchers are already furnishing for this wildlife, then wildlife could be improved. It has been improved in Texas. It is managed in Texas by private people and by private ranchers. They have game down there like we have never seen. They are harvested in an orderly manner and is a profit making thing. The responsibility of improving game numbers is being put on the ranchers.

PERMITTEE MEETING

Gerry stated that he could not really deal with the Game and Fish issue. Gerry stated that the State Department of Agriculture also felt that the Plan inferred that the only reason wildlife did not increase was because of grazing. There are some shortcomings in the plan that need to be changed. In the Plan, we may have inadvertently inferred that the problem with big game all has to do with there being too many cows out there - that if we took all the cows off then we would be in better shape. That was not our intention. Let's look at the Current Level Alternative as an example of how we tried to coordinate some of these kind of things. On the Current Level Alternative, we assumed if we continued on the current management direction, we would have deterioration of grazing improvements, including waters, over time. We also assumed that as a result of those waters dropping out, wildlife would decrease as well as domestic livestock. We may not have given enough credit in the document to how permittee maintenance and other activities benefit wildlife. We may have not conveyed the fact that all of you out there provide an important service from the standpoint of keeping wildlife up to some level. We believed that is something that we needed to work on with the ranchers to see if we can figure out some better way of wording some of these things in the document. It was not intentionally done, but evidently it did come across that way. We feel that having permittees out there is an important thing, and we are not trying to put the blame on the ranchers from the standpoint of wildlife. The other question that came up last night was what we were going to do when we make these 50 percent cuts and then they find out that the wildlife does not move into the areas. We feel that this is a very good question and needs clarification. Where cuts are made to improve wildlife, cuts would be made gradually and would be made when conflicts occurred or when conflicts are beginning to occur. It is not something that we are going to do as an experimental kind of a thing to see if we can get more deer or to see if we can get the elk to move into an area. That is something we need to clarify in the document and is a very good point.

Bill Allen from Pacific Western Cattle Company wanted to make a statement to tie into what everyone had been discussing. He stated that Gerry had indicated that the study had been based on values like hunting and grazing permits, etc., and that the Forest Service did not make a profit, so to speak, on any of these. The Forest Service did not get any money whatsoever from wildlife, however, the ranchers are providing some income to the Forest. We feel that it is adequate, but the Forest may disagree. I want to read from Page 210, which refers to our particular allotment, a statement which seems to belie what we have been told this morning. For our particular case, "wildlife habitat capability will increase from the current level of 2,294 WAUMs to 15 percent above the current level by the mid-point of the fifth decade. Permitted livestock use will stabilize at approximately 40 percent below existing levels by the end of the fifth period." At this point he questioned the use of the word "stabilize", stating that it should probably be "reduced".

PERMITTEE MEETING

Tom Klumker stated that this says to him that the Forest is indeed enhancing wildlife and working a hardship on the ranchers. The whole Plan leans toward wildlife enhancement and through arbitrary proposed management direction, whether it be from Washington or whatever, the Forest Service is putting in the Proposed Plan cuts from 10-60 percent of the livestock AUM's and increasing wildlife up to 80 percent WAUMs. The whole Plan is definitely written in that direction, yet, he stated that Gerry admitted last night that this whole wildlife issue would have to have the cooperation of the New Mexico Game & Fish Department to even begin to implement any of these decisions and it looks to me like the Proposed Plan is based on a lot of assumptions on what might happen if the Forest Service got cooperation from the Game & Fish Department. There are a lot of "maybes", yet Gerry was saying that they had identified from the range people out in the Districts certain, maybe marginal, allotments that may be close to the wilderness, that may be better for wildlife than livestock and that will be cut. But what about the economic impact that this will have on these individual ranchers, that issue was not addressed at all, as well as the local economy. The thing that really scared me the most was in the letter that Ken Scoggin sent with the material to the permittees. There were two paragraphs in that that were very scary - the current management direction which by the end of the 5th decade, if we continue the way the Forest Service is being run now, there will be a reduction of almost 100,000 AUMs out of the 380,000. But through the Proposed Action, the Forest was proposing that by the end of the 5th, there would be only a 350,000 AUM cut. This would be a reduction of 30,000 AUMs, which doesn't sound too bad on the surface, but in the middle of the paragraph it says, "permitted use livestock by the middle of the first decade is expected to be approximately 347,000 AUMs. We are talking from the middle of the first decade, reduction of from 380,000 permitted right now to 347,000 within five years after you get your final Plan. This is an immediate reduction of 18 percent of the AUMs on the Gila National Forest by the middle of the first decade, which tells me that it is going to take place in five years, yet this is supposed to be a long far reaching plan. On individual allotments, like they were dealing with Donald Hookers and Roland Rices, you propose to cut their very livelihood within five years by 50-60 percent. What are they going to do? The Plan needed to consider the impacts to these ranchers and not base the whole Plan on what may be happening to wildlife - projecting that you are going to increase wildlife over on Donald's place by 90 percent and cut his cow numbers by 60 percent. This was totally absurd and should never have been put into these documents. Like Art said, Section 8 of this thing has been totally disregarded. When did any of the Forest Service people ever come out and consult with the actual ranchers who have been there decade upon decade. Terrell Shelley's family has been there over ten decades. Yet, they were not consulted on how they can improve the deer herds on their particular areas or on how much browse their cattle eat, and the Forest Service goes out and does the range analysis on tall grass. He stated that the Mule Creek Country looked good as it has tall grass, but the cattle there were skinny in the winter time and the cattle in the Burros hold their own and are doing good. The Forest Service does not recognize so much browse or weeds even. They do not measure the weeds, but only measure the grass production in one year, and they do not even measure the regrowth that the cattle are grazing. The grass will grow again. The whole procedure is lacking and the Forest Service should consult the ranchers who have been managing these lands for over 100 years as they can tell them what the cattle are doing out there, about the wildlife, or how a mountain lion lives. The ranchers should have been consulted a great deal more than they have been.

Gerry stated that Tom's point about getting input from the ranchers is a good point. This is the reason the Forest Service has these kinds of meetings and why we wanted to have these kinds of meetings so that the Forest Service can get this kind of comments. The Forest Service did use the best information that we had, and that information resulted in the Plan direction we came up with, but it is not infallible by any means. That is part of the reason that we are asking for comments, so that if there are problems with some of the data, you all can bring those problems to our attention and we can take a look at them and see if there is really a problem with the data that we need to deal with.

PERMITTEE MEETING

Dave Vackar from Glenwood introduced himself and stated that his understanding of the Forest Service role was basically to conserve and protect the Forest for the benefit of all citizens in the United States, while at the same time, under the multiple use concept, produce maximum potential from the products from the Forest, basically timber, grazing, tourism, recreation, and minerals. When the Forest initiated this Plan and started in this, specifically how did the Forest set their priorities and what does the Forest Service expect, irregardless of what type of plan they derive? What do you expect to have when you have a final EIS on this? He stated that the Forest had some rather conflicting industries out here on the Forest. He asked if the Forest Service went into this process with already set priorities or with goals in mind, or is the Forest Service basically coming up with an accumulation of data that is supposed to lead you in some direction. Dave said he was unclear as to what the Forest expected to derive from this.

Gerry stated that they had done a little bit of both. We did accumulate a lot of data. We went through a process of analyzing what the maximum potential of the Forest could be for various different resources, if we just managed on a single resource kind of a basis. These were what we called benchmarks. They told us what the maximum resource supplies were. Then we went back through a series of management team meetings in which we looked at the budget that we had to deal with, we looked at where we are now, and then we tried to satisfy demands. The end result of this analysis was that there are more demands on Forest resources than we can satisfy. This is why plans are very controversial. We are getting a lot of response from environmental groups saying that we should balance grazing permitted use with capacity in the first decade, as an example. We are getting a lot of response saying that the cow numbers are too high, we are getting wildlife responses that are saying that "we want more wildlife out there, wildlife for hunters, fisherman, etc., we are getting response from the ranchers saying that you want to keep those levels up as high as we can possibly keep them up. What we are doing is kind of a balancing act. What we come up with will probably be something that no one is going to like, to be quite honest with you, but hopefully that everyone would be able to live with somehow or another. And there are going to be some hardships on people. There are a lot of people from all sides, and there is a different kind of a hardship on the ranchers because it does have to do with their livelihood. In that respect, Tom's point was well taken. We may not have done a very good job in the draft in terms of explaining some of the possible effects on ranchers. These were things that we will fix up when we come out with the final Plan.

Mr. Vackar asked Gerry if demands were national priorities? For example, did the Administration or the Forest Service Office in Washington say, "we want to increase timber production for national policy goals or decrease grazing?" Mr. Vackar said he did not understand Gerry's clarification of demands. You are trying to come up with a plan unique to the Gila National Forest not one for a forest in Montana. At the same time, are these demands arbitrarily set on the Forest Service by Congress, by environmental groups, grazing groups, where did the Forest Service get these demands?

Gerry stated that the demands were not set on them by the Washington Office or any place else. They were the Forest's best interpretation of what we felt the demands on this individual forest were.

Mr. Vackar asked if these were based on their past history or what?

Gerry said it was based on our past history and what the managers, district rangers, and those folks are seeing out on the Districts. Part of the reason we have a draft plan is so the Forest Service can verify these kind of things and so that we can get comments to indicate if our analysis of those demands is correct, or not correct and get feedback to see if we are heading in some kind of a direction that is anywhere close to where we ought to be heading. That is why I said at the beginning that if the final Plan ends up being what the proposed Plan is right now, I would be very surprised. There will be some changes and these changes will be based on the kinds of comments we get from the people that are responding to the documents.

PERMITTEE MEETING

Art Tackman stated that on September 24, at the Public Lands Counsel Meeting in Denver, Bob Williamson, Chief of Range for the U.S. Forest Service, made the following statements: He said there was going to be less livestock grazing on National Forests and he furthermore said that the Forest Service will continue grazing only on those areas where it is cost effective. Art said that it seemed to him that the Washington Office has in advance some definite priorities, and secondly, they are taking into consideration some of the figures they have been talking about there earlier, which seem to be open to serious question.

Gerry stated that the only real direction we have gotten is from the administration from the standpoint of cost effective management, and the direction is that we are getting more and more indication all the time that we need to be operating in a more business like manner from the standpoint that if we have areas that are higher productivity, we ought to be trying to get as much from those areas as we can with a limited amount of budget dollars that we have. In terms of the other things that Bobby Williamson said, I really do not know about these. Some of the political aspects are now from the standpoint that our dealings with the public, including you all, really are a political process. We are getting pressures from the ranchers, we are getting pressures from environmental groups, etc. That is really the political arena when you really get right down to it. The other point that Bobby Williamson made about the

reduction, may have been talking strictly about the ranching economic situation over the whole country.

Art Tackman stated that Bob Williamson also made the statement that grazing would be ultimately phased out of many marginally low productive ranges. He said that permittees would be expected to exercise better stewardship. Art asked if it was not true for the Gila National Forest that a sizeable percentage of the Gila National Forest grazing is done with approved AMPs? Is this a true statement? What percent of grazing would you say had approved AMPs. At this point, several voiced the opinion of between 80-90 percent. Art continued by saying that for the past number of years, 90 percent of the grazing has been done under plans that have been approved in concert with the Forest Service. In other words, the Forest Service has been just as much responsible for the level of management as have the permittees. He asked why the constant strike at the stewardship problem and permittees not doing an effective management job?

Gerry commented that Art would probably have to ask Bobby Williamson that question. He further stated that he didn't feel that the Forest had attempted to blame permittees for the range problems indicated in the plan. If you feel we did that, then that is something that you all needed to comment on so that it can be corrected.

Walter Briebelle questioned why they needed to go to Bobby Williamson? He stated that the Plan had come out of this office - don't go to Bobby Williamson - put it on the Board, who in the office did it - what are we looking at? This is what the ranchers are trying to get at.

Gerry said that if we stated in the Plan someplace that we were having a lot of problems from the standpoint of the stewardship problem that you are all talking about, I don't know where it was. If you can bring it to our attention, it is something that we can try to reword or whatever so that it doesn't sound that way.

Walter Briebelle asked what he meant - 60 percent reduction as versus a 15 percent increase in wildlife, if not an admission of failure of proper stewardship? Who is the Forest pointing the finger at?

Gerry stated that it was not necessarily an admission of improper stewardship. What it is an admission of is the fact that we have a lot of demands out there and we have to recognize those demands as well as the grazing demands.

Bill Allen said he wanted to make one more comment. He said that it seemed to him that the Forest's thrust was in the wrong direction. Recreation and that sort of thing do not weigh nearly as much monetarily or philosophically as does livelihood. Instead of having the thrust it does have, the Plan should have a thrust of better management with a view to increasing the number of animal units. Speaking from his allotment, he personally felt that it was undergrazed right now and that with even better management, it could be improved so that everyone could get a little bigger bite.

Gerry felt that this was a very valid comment for Bill to make. On the other hand, we are getting comments from the other side that are saying, "we are tired of putting dollars in from the standpoint of taxpayer dollars, to pay for commodity kinds of outputs that aren't paying for themselves. So, it is basically like he mentioned before, it is our job to try and put all those things together. From the standpoint of legally legitimate uses of the National Forest, they are all legally legitimate uses and we can't ignore any of them."

Tom Klumker stated that what really disturbed him was the Forest's determination of capacity on the Gila National Forest in their studies. Also their determination of the million acres of unsuitable "category" full capacity rangeland. He said the Forest had their soil tests, PU studies, range analysis studies, etc. to back them up, but he felt that most of the Forest personnel went to school and graduated from the same colleges that the Soil Conservation people and the New Mexico State University Range Task Force, and it seemed that everyone of them, depending on what agency they worked for, was going in a different direction. Yet, they all went to the same Range Management classes, probably had the same professors. It seems to be more direction from the agency rather than the actual, "what's taking place on the lands". There is a great deal more capacity out there than what the Forest Service has in the plan and ranchers can live with wildlife. Those conflicts can be avoided with the elk, deer and the whole bit. Tom said that the whole direction of the plan is singling out the grazing livestock industry, the public lands ranchers, unfairly, and as a result as Art stated, New Mexico State livestock industry is really going to oppose your Proposed Plan and try to get something better than what the Forest Service has there.

Gerry stated that the last statement that Mr. Klumker made is really the important statement. That, "you are going to try to get something better than what we have here". That is what we are trying to do also. That is the reason it was very good that we are in these kinds of meetings. We want to work with the ranchers on these kinds of things to see if we can come up with the best plan possible, recognizing that other demands do exist and that we have to deal with them as well.

Art Tackman stated that the Forest Service keeps talking about all the forces and parties that are involved and yet, when you think of it in terms of economic consequences to individuals and economic consequences to the community, there is not much affect on the economic consequences to the community or to the individual with respect to wildlife or with respect to timber as far as this report is concerned. You can bear right on the single area where there are terrific economic consequences, and that is grazing. That is a consideration that should not be ignored. We have families in the Gila National Forest, as Tom pointed out, that have been on their ranches since the late 1800's, and yet there seems to be a complete disregard for the economic impact. The Forest Service can no longer disregard that - you can no longer take refuge in the fact that there is no permit value, that there is no value with respect to the grazing. There is value and it is a value in human suffering and human livelihood. This is the single most important consideration - not necessarily that all of us are personally involved. I am speaking for ranchers that are not there today - ranchers on the Gila National Forest who have been on their ranches for years; for tens of years, whose livelihood has been mitigated many times by Forest Service cutbacks and who have had to moonlight in order to earn a decent living. They are not, as someone pointed out in the Albuquerque Journal in a letter yesterday, the cattle baron - I don't know of a single cattle baron in the Gila National Forest. If there is one, I sure would like to know who he is and get a nice financial support from him.

Louis Oliver interjected that he had some "Baron" cows - would that do?

Art further stated that the cowboy concept that is a matter of romantic consideration in the story books of maybe Zane Gray 50 years ago, doesn't exist. 95-98 percent of the ranchers are exiting on their ranches today. I am talking about public lands ranchers. If the fee formulas are changed so that the fees are doubled or increased by more than 10-15 percent, they will go out of business. They are going to have to leave the community. We are talking about a New Mexico industry - we are not just talking about individuals, and that is completely missing in the DIES, its completely missing in the Proposed Plan, and Section 8 was completely avoided. The Forest Service has never implemented Section 8 - You have maintained that it is a part of the regular procedure, which was in existence even before Section 8 was passed, but that is not true. It has been completely ignored and the ranchers have not been taken into consideration, communities have not been taken into consideration and the whole economic concept has been down the drain.

Dave Vackar commented that on the analysis, the Forest Service had been very deficient in the proposed DEIS in one area. I applauded the Administration's direction to you and me, I hope that we will be as conservative and responsible on the budget as possible, but when you got into a process like this, it appeared that he may have gotten down too hard with the dollars and cents in figures, because when I go through the process in the book, for example grazing, you are trying to get it down to the point of how much money the Forest Service is putting into the management versus how many dollars in revenue are coming back out, and I didn't feel that enough consideration was given to all the other associated benefits that the livestock industry put out on the public lands. For example. The tourism and recreation - a lot of the roads that the tourists and hunters use to get back out into the Forest are there primarily because a grazing permit is there and they are actually range improvements. A lot of the wildlife they are going back to see are there because of the improvements from the range. That can also be said to a large extent for some of the other uses on the Forest - timber, for example, also puts a lot of multiple use roads back in the area. I personally did not think we were taking enough into consideration or have put a dollar value that is high enough on those associated values and variables involved. I think you are trying to break it down too basic, to some extent, especially when we collate the fact that tourism/recreation, and the woodhauleders go out and tear the roads up that all the rest of us have to pay for (and I'm not saying they shouldn't be out there cutting wood, but there is an associated cost of all these other uses on the Forest.) It appears to me that primarily the permittees that are there day-in and day-out, where we all live, have to bear the brunt of it and those other associated values are not paying their fair market value for the use of the Forest. I feel this over-emphasizes the values you think you have to derive from grazing, from timber, to some extent from minerals, although they have preferential treatment in the first place on the Forest from these other values. I felt we needed to go back and maybe take another hard look at the values that we put in the Plan as far as it is simply not how many dollars come back versus how much goes in, especially where many of these values are going into the grazing allotments that are put in by the permittees themselves. I am not a professional expert in this area, you are going to have to do that, but it also appeared that maybe some of our values can't be justified when the Forest Service states, as they did earlier that, for example, wildlife values are simply an arbitrary value that the Washington Office sent down for us to use that is possibly an average of all the wildlife uses throughout the United States on National Forests. These may have no bearing at all for what the cost or use would be here on the Gila National Forest, yet, you also say that we are trying to come up with a unique management plan just for the Gila. I feel that there are some serious deficiencies in Forest Service values and the way they are used in the justifications and that the emphasis was not given to what variables are involved.

PERMITTEE MEETING

Gerry stated that Mr. Vackar's points on values and things were well taken. One of the things that is important to remember, though, is that the values aren't driving the end result on this Plan - not a 100 percent. What the values are doing is indicating which areas are best from the standpoint of which areas we can get the most of the kinds of things that we are trying to get, with the least amount of budget dollars involved. They really don't drive processes. We did not let it go free. If we did, it would have gone basically to the maximum wildlife prescription that we were dealing with, but we didn't feel that that would really resolve the kinds of problems we have on the Forest, so we basically told the economic model that it couldn't do that.

Dave Vackar asked Gerry then what is driving it? *Are you going through this process to try to look into the areas that you feel like you are putting too much money into and you want to change that to other areas?* Again, what is your end result - how do you justify what you hope to achieve out of this?

Gerry stated that what is driving it, is kind of like what he had been saying about the management team meeting - what we did was that they started off with an alternative that was basically to maximize present net value to maximize the economy value. This was including those values that Mr. Vackar was talking about. We then looked at that alternative and said, "Now, that doesn't totally hack it as far as satisfying the kinds of needs that we feel that we have on the National Forest - the things that people want and the things people need to get from the National Forest." So then we said, "Now, what do we do in order to get there?" So then we started putting in certain kinds of constraints and saying that, for instance, we felt that the level we should be at, considering the demand that you all have, considering the budgets that we have, was the 350,000 animal unit months. If that is not the right level, then that is the kind of comments that you needed to give them. That grazing level took a chunk of the budget that we had to deal with. With the remaining budget dollars we said, "OK, now we need to do some other kinds of things out there. We need to deal with recreation and we need to deal with timber and we need to deal with wildlife." So we tried to split those things out in what we thought, again, was the most equitable manner to best satisfy those issues that we had developed early in the planning process. That is kinda how we got to where we got on the modeling part of the thing. As for those joint benefits that Dave was talking about, we did try the best we could to include those things. For instance, when we do timber activities - those timber activities result in our opening up stands which produce some additional forage. We track those things. When we did range improvements, like you are talking about, we knew that had some effect on wildlife, so we tried to indicate what effect that had in terms of either keeping wildlife numbers up or increasing them. We did what we felt was the best professional job we could trying to do those kinds of things. Again, if there were certain areas that we screwed up on, that is what you guys need to bring to our attention. That is the best explanation we could come up with. It is somewhat subjective when you really get right down to it as far as the proposed action alternative. It was our best judgement as to where we thought we ought to be heading in the future. Now it is your job and the job of the other publics to tell us if we haven't made the right assumptions.

Dave Vackar stated that it also appeared that the Gila National Forest kind of set themselves up as unique and totally uninvolved with their surrounding environment to the extent of the local municipalities and counties that derive income and depend on a strong part on the income from products derived from the Forest, such as Forest reserve based on the timber; the social impacts on the individual permittees, and individual timber operators. Possibly in certain areas you may impact on those. Did you give any input at all to these types of considerations?

PERMITTEE MEETING

Gerry stated, "yes, we did". There is a section in the Environmental Impact Statement that deals with social and economic impacts. There is another kind of an economic model that we have that gives some indication, based on changes in the different outputs from the existing situation, where we are going with the Proposed Action Alternative and with the other alternatives, as to what effect there would be on jobs, and those kinds of things. So we did give it some consideration - we may not have done as good a job on that as we can, but I think that is something we can work with you all on and try to beef up.

Mr. Vackar asked what weight this would carry in the final decision?

Gerry stated that it was a factor, and that was all he could say. All of these things are factors and we don't have anything that says this one is rated a nine and this one is rated as a two and then add them up at the bottom to come up with the answer.

Mr. Vackar stated that maybe he was getting the wrong impression. He stated that the process was coming across to him as a very in-house arbitrary subjective decision that four to five Forest employees are going to make after we go through this process and then you are going to decide to come out with your final Draft. At the same time, I really questioned the methodology that you are using, the decision that you are finally going to make which is going to have a long term impact on those of us who live in New Mexico and depend on the Gila National Forest for our livelihood and our future and our children's future. At the same time, it appears that those of us that live right here and are impacted most quickly by it have the least amount of input into the whole process. It appeared to me that there are a very small very subjective arbitrary decisions being made based maybe on public input, and then it gets to be a vote counting process where you have 500 Wilderness Society members versus 50 permittees or even the other way around, which isn't right either. I really questioned how you are going to come up with a plan, and I realized that it wouldn't solve everything or satisfy everyone. We are coming up with a plan that is going to impact on everyone's future here and I really question how justifiably you were going into that process.

Ken Scoggin asked to make one short comment. If I can refer back to what Gerry said that the Gila National Forest has a limit on the resources, goods, and services that it can produce. There is more demand from all the special interest groups than we can satisfy on any one of those, if you want to look at any one of those by itself. If you set that perimeter for yourself, what we have done is try to look at what a maximum range output would do to the other resources. When you do that, it is not acceptable to do that to the other resources. By the same token it is not acceptable to do all wildlife and all timber and no range. When you maximize any one, the others go to hell in a hand basket, if you will excuse my expression. What we have tried to do is come to the best balance in the long term that we could possibly come to, considering all the resources, uses and activities. No one is going to get all the cake, there has got to be some give and take.

Art Tackman stated that this is what they were objecting to - we're objecting to the amount of damage and injury that is being done. What injury is being done by maximizing or not maximizing wildlife? You aren't doing any injury whatsoever. You are not doing any injury to almost all the other considerations except the ranching consideration.

Ken asked Gerry how it ended up - how is the balance between the forage, 50-50?

Gerry stated, "no, it's not near 50-50. Its probably 2/3 to grazing and a 1/3 to wildlife."

Ken stated that this was the total they have, 100 percent. Two-thirds went to grazing and a 1/3 went to wildlife - do you want us to balance it out the other way?

PERMITTEE MEETING

Art Tackman stated that it was not a matter of balancing. It is a matter of history, a matter of use, a matter of benefit and a matter of injury.

Gerry felt that as far as the injury was concerned, Art's injury was different than someone else's kind of injury. There isn't any doubt about that. Your injury deals with financial kinds of things that deals with making a living. That is a real situation, there isn't any doubt about that, but the other people that we are dealing with are also saying that they're being injured. They are saying they are being injured in a different way, not maybe from the standpoint of livelihood, but their values are saying that there is something out there that they want to see remain out there or that there is something that they want to see out there that isn't out there, so they are feeling an injury too, just like you are feeling an injury. Granted, it is not the same thing, but from their standpoint, they feel like it is the same thing, and that is where we are coming from in trying to come up with an alternative that balances uses.

Dave, as far as the process we are using to come up with the final alternative and the process we came up with for the proposed alternative, I would really be interested if you have some way that you think we could do that better. There may be some better way and we are sure willing to look at it if, there is. Right now, we are trying to use our best professional judgement to come up with this balance. It's no fun for us either - we are right in the middle of the thing. What it amounts to is that we are getting clobbered by you guys and clobbered with the environmentalists and clobbered by the Game and Fish and the other interests. So, we are not in what I would call an ideal situation right now either. If there is a better way to come up with an equitable solution to this and come up with something that we feel everyone can live with at the end, we are more than open to look at how we can go about doing that.

Tom Klumker stated that one comment made by the Department of Agriculture, Karl Heston in particular, was that the Gila National Forest should leave grazing numbers as a constant for a period of time until this issue can better be addressed and until you get your studies, etc. done. If you are proposing these cuts within five years after the adoption of this Plan, it is ridiculous. I agree with Karl that the grazing numbers ought to remain constant until there is a better, so to speak, study or a better reason, or at least let permittees know exactly how you determine the numbers.

Gerry stated that we will do that. The grazing numbers will remain constant until such time as we can go through the standard allotment analysis procedures that would result in some kind of an increase or decrease, but we have to go through this process and set the management direction on areas. If we don't do that, we are never going to be able to resolve any of these conflicts or even address any of these conflicts, and they are just going to get worse - they're not going to get any better. I don't think the answer is to just give up and say, "well, we're going to forget that we did this thing and we are just going to go on and assume that these problems don't exist", because they are real problems and what will happen next is that we will be going out doing allotment management plans and we will be getting appeals from environmental groups on allotment management plans. We might just as well try to resolve the problem as best we can, using this kind of a framework and then, hopefully, be able to go about our business and do what we need to do to improve the management of the National Forest.

Mr. Klumker said when your staff goes into the field, say like on Donald's allotment, in the next five years, he is already slated for 60 percent cut. I feel that you staff from the start is already biased. They are going in, knowing darn well that you have already identified his allotment probably as being one to reduce 60 percent. I maintain that these standard allotment analysis procedures are not going to work unless it is a start from ground zero with the permittees on an equal basis. Many of the permittees have been here ten decades and I think when you propose these 50 percent cuts and you send your people in, in the next five years with that in mind, it is going to have a great bearing on the allotment analysis procedure.

PERMITTEE MEETING

Gerry stated that we had talked about this before. I know that there were a lot of concerns in that direction and I know that whatever he said isn't going to make that concern go away. All I can tell you is that when we do go out there and make those kinds of analysis, we'll do the best professional job we can do. We're not out to cut anyone's throat on this thing. What we are out to do is try to figure out where we go from here from the standpoint of management for all the different resources. If we can somehow or another, when we go through those allotment analysis processes, see how we can accomplish the management direction for all uses without reducing one of them or the other one, we will try to do that. This is our mandate, to try to get the most we can off of those acres.

Mr. Klumker said that he maintained that the ranchers and the wildlife can live in harmony. It goes back to what I stressed all along that you take these old ranchers that control mountain lions and coyotes and bears for years and they have some good wildlife herds, if you eliminate them, already you are back to zero and you are never going to reach your wildlife objective. I think this has a lot of false assumptions that - there may be a few conflicts with elk more than anything, but I think that can be resolved easily; if the Game and Fish will take the bull by the horns, so to speak, and manage their wildlife like they should.

Gerry felt that what Tom was saying was a good point. I think it is something that we really need to look at in terms of that value of having you all out there, and there is a real value, there isn't any doubt about that, just like we were talking about last night. It is something that we may not have done as good a job on as we can do and I think it is something that we need to look at between the draft and the final. What we tried to do was to indicate that there is some compatibility between livestock and wildlife and that compatibility does exist up to some point. But at some point, there is only so much out there to eat and one or the other of them is going to eat it. At some point, forage consumption will have to be controlled by reducing cattle or wildlife and one is going to have to go away or you are going to end up with resource damage.

Louis Oliver stated that that point was dealt with years ago. These numbers that we are now raising have been arrived at over due process for many many years and we feel like we are at a pretty good balance right now.

Gerry said, "yes, the numbers had been arrived at over a good many years, but when most of the allotment management plans were done, the allotment management plans were single resource plans and the objective was basically to maximize livestock." There was some consideration given to wildlife, but usually not given to wildlife from the standpoint of increasing wildlife over the existing numbers that were out there.

Louis Oliver said that the Forest Service has heard from all these free user groups that want the cattle off the forest, and wanted to know if they ever stated just exactly how it is that cattle up here are hurting them? What are the cattle doing to these free users that they want it to themselves?

Gerry stated that he would have to go back and look at the rationale in some of the letters to really answer that question. We have not had very many letters that have really said, as a matter of fact, I'm not sure we have had any letters that have said "take all the cows off the Forest." There is a concern about overgrazing and there is a concern about conflict between wildlife and grazing. Louis Oliver asked if these people are referring to now, these city dwellers - these so called ecologists, in Gerry's opinion, do they have the faintest idea of what constitutes overgrazing? Do they know more about overgrazing than you do and that we do?

Gerry stated he did not know the individuals involved, but there was a good chance that there may be some of them that know more about overgrazing than I do, because I am no expert, by any means. I really can't answer as I don't know the individuals involved.

Louis Oliver stated that he did and he didn't think these people that are doing this howling know beans about grazing, either overgrazing or undergrazing.

PERMITTEE MEETING

Gerry said that if they said that some specific allotment on the Forest is being overgrazed and they want to reduce the numbers out there, we are not taking that as gospel on the thing.

Louis said that there was another glaring fault in this Plan. You have said repeatedly that these cuts will be arrived at by these studies and analysis. That is totally untrue. Your cuts have already been arrived at - they are already printed in this book. You have arrived at, for instance, in Donald Hooker's area, a 60 percent cut. Why bother with the study - you already have your figures?

Gerry stated that we have developed a management direction for each specific area and that management direction is estimated to result in the declines or increases projected. If on site analysis, it indicates that we can meet the management direction for all resources and provide for deficient livestock numbers, then the projection could change. The numbers are not absolute.

Walter Biebel asked why it was used?

Gerry stated it was because we have not found any better way to put something in the Plan to give us the management direction we need without the numbers.

Walter Biebel said that its in quotes - you have set the goal is what you are going to do?

Gerry said it was not a goal - its a direction. There is a difference between those two things.

Mr. Biebel said that you drive up to a stop sign, your goal is to get to that stop sign if you don't get run over before you get there - right?

Gerry said, "Yeah, I suppose."

Mr. Biebel said, "OK, your cuts are there - if you can get there before the cut does you're in business. If you don't, you are in trouble."

Gerry stated that the goal that's there is to get some mix of wildlife and livestock. If that mix turns out to be higher than where we are at, then we will go higher than where we are at - if it turns out to be lower than where we are at, we will go lower than where we are at.

Mr. Biebel asked why they didn't consider fire control and suppression in this reduction of livestock? Number two, the model you refer to for your economic analysis, what computer did you use - Apple or...Where did you get your economist - who was he, where did he get his education, what does he know about the ranching business, is he a banker, or is he an Audubon Society member, where did he come from, who is he?

Gerry stated that the information that was put into the model and formulation of the model was done by group of people here in the Supervisor's Office. All the information was verified by talking to the District people and by talking to the District Rangers and the management team. Again, as far as that model is concerned, the model did not make the decisions - all it did was give us some indications and then we looked at those indications and determined which way we ought to go. That was the professional judgement of the line officers on the Forest. This is where the direction is coming from.

Mr. Biebel asked how many professional economist we have on the Forest.

PERMITTEE MEETING

Gerry stated we have one professional economist.

Mr. Biebel asked if his input weighted 1/6 or 1/8 of the total input put in by the district personnel?

Gerry said he could not really answer that because his input did not really weigh at all. The district personnel were the ones that reviewed the solutions at the end, the alternatives at the end, to see if those alternatives looked like they were right or not. The district personnel and the district rangers, the line officers, are the ones that are making the decisions. The model is not making the decisions, the economist is not making the decisions, I am not making the decisions. All we did as far as the model part of the thing is concerned was try to build a tool to give them some information to make those decisions.

Mr. Biebel said, "And printed it that this is the way you are going to go".

Gerry said, "no. It gave the line officers an indication, from an economy standpoint, where we wanted to go and like I was telling Dave, that at that point, they looked at it and said, "ok, we can't go strictly with economics on this thing, we have to do some other things out there". They did those other things and that's where the alternatives came from that are in the document. There weren't any Audubon people or Sierra Club people or anybody else that were really involved with this up front. It was basically Forest Service people.

Mr. Biebel said that then, basically, the Forest Service people feel that the multiple use concept is no longer a viable and applicable tool with which to work along with. The data which you have accumulated over the last five years and have put into that document is based on the fact that in five years more that will be completely changed by virtue of law.

Gerry stated that it was interesting the interpretations that are going on just as an aside in terms of multiple use, sustained yield act, right now. We got a letter from a wildlife organization and their interpretation of the multiple use act was that we had to have 50 percent of the forage going to wildlife on every acre in the National Forest. That was multiple use.

Louis Oliver asked where the Forest Service is going to get the wildlife to eat this percentage of the forage? This is what I am getting at, the wildlife isn't there and the potential isn't there unless they are managed. Allotting so many blades of grass is not managing.

Gerry agreed and said he could not argue with that.

Louis stated that this was a big glaring defect in this Plan. You are not putting the responsibility for wildlife where it belongs. It does not belong on the rancher. The rancher is doing more for wildlife than anybody. Today, in my opinion, and I believe that a lot of people agree.

Gerry said that he didn't believe we are trying to put it on the rancher. We are trying to provide the habitat. Then it is up to the Game and Fish to provide the management that is going to result from those animals going into that habitat. If that does not happen, just like I talked about a while ago, then we have to amend the plan. I think you are exactly right when it comes to wildlife. We, for sure, do not have absolute knowledge of where those deer are going to go or where the elk are going to go. All we can do is make our best approximation of what we think is going to happen and then look, after some period of time, and see if it is happening or not. If it isn't, then we have to look at a change of direction a little bit more somewhere else on something.

Louis asked Gerry if it wouldn't have been more appropriate to let the Game Department produce this wildlife that needs this feed and then give it to them. They are not there, they are an imaginary thing.

PERMITTEE MEETING

Gerry said that they are there in some areas now. In the meetings we have had in Luna and some of the meeting we have had in Quemado, there was some concern about the fact that the number of elk out there now are high enough that they're having some problems as far as conflict. So they are there now in some areas.

Louis said that elk are on a very small percentage of our public range.

Dave Vacker said then that what the Forest Service did was to go through this process of looking at these individual units, plugging that data into the computer and then letting the so called trend or direction, based on economics, tell you which way to manage those areas in the future?

Gerry said the Forest Service did this as a start.

Dave continued by saying that, instead, the other option might be to try to set some long range production and management goals for the Gila National Forest, such as so much timber per year derived from it, or so many AUMs, and trying to manage the Forest to meet those roles. You didn't look at that alternative or didn't feel that that was your direction from Congress?

Gerry stated that Forest personnel did look at that alternative in the sense that we did the benchmark runs where we tried to maximize individual outputs, so we knew what the maximum realm was, in technical term, the Decision space, but the maximum that we could get on these different resources was only applicable if we didn't manage for the other ones. We knew we couldn't go above that maximum. Then we had to try and come up with some combination within these maximums. When you start grabbing a little more of this one, the model usually reduces some other output. If we did not have a budget constraint, we could probably have more range and have more wildlife too at the same time, but that is not a reality. That is something that we built in there in terms of a constraint on ourselves, trying to keep that budget somewhere where we thought it was reasonable. It really gets to be a complicated process when you really get into it. There was a lot of gnashing of teeth going on as far as the Rangers were concerned, because they were looking at things too, and they were saying, "Ok, now we have this amount of range out there, let's see if we can get a little bit more." So we shoved in a little bit more and, what would happen, something else would be reduced. We would have less timber or we would have less wildlife, or something would change.

Mr. Vacker stated that by doing that you changed the valid process with the end result. It appears that on some of these management areas you have already made a predetermined decision that in all probability there will be a change in emphasis and impacts. At least different from what is going on out there today. You have already made a predetermined decision based on some arbitrary variables involved that you have put in. It appears to a lot of people, I think here in this plan, that you are simply trying to justify now a predetermined decision. The thing I hope you realize, and a lot of other people realize, is the fact that the permittees out here have made loans, their economics, their personal income is based on variables that you've put in and at the same time these have been managed for many years with, depending on who the permittee is, anywhere from 0 percent to almost 100 percent direction from the Forest Service. Yet. I think you are sincere in your trying to manage this for the benefit of everyone, when you go to that point, based on a different past of how it's been working, these people are the ones that are going to get penalized. You maybe are going to increase your production to meet all these goals that Ken is talking about, but at the same time, that individual is the one that is going to get penalized for it - not the Forest Service, not the land user in New York City, or anywhere else, but that individual permittee. I don't think you have given enough weight on the impacts on those people that are out there on the land, day in and day out and have been for a long time, and the associated impacts to their communities and their counties in the State of New Mexico as a whole. I don't think you have put enough value into that. I don't think you are spending enough time looking at it. It's easy to not consider it because there aren't enough people out there - there aren't many grazing permittees on the Gila National Forest when you compare it to everybody else as far as the number of users that come on for a day, whether it to for Willow Creek or however you do that. The impacts to those individual permittees, I think, deserve more attention than they have been getting.

PERMITTEE MEETING

Louis Oliver asked Gerry, "How about starting to charge these other people who use the Forest. We pay, the Lumber industry pays - why don't the rest of these people pay too? Charge them \$10.00 a day to hike nude up there or whatever else they want to do." There is an awful lot of this going on.

Gerry said that right now we don't have the authority to do that. There have been some bills proposed before Congress to do that but none of them has passed. That's about all I can say on that.

Louis said that you keep talking of the economics of this thing and there are no economics other than the timber industry and the cattle industry.

Gerry said that this was one of the points he was trying to make. We keep talking about the economics of this and there are no economics. I think you are exactly right because what happens is, just like we talked about awhile ago, there is nothing on the Forest that is paying its own way. As a result of that, everything in a sense is subsidized if you want to use that word. I know that's a word people don't particularly care for.

Louis stated that he agreed and that the cattle industry isn't.

Gerry said that from the standpoint of the Forest budgeting process and the amount of dollars that are spent on range versus the amount of dollars that are taken in by government - there are more dollars spent than are taken in.

Louis said that this was not the fault of the cattle industry. That's top heavy personnel.

Walter Biebel asked why the Forest Service charges a cow for the water the deer drinks and the water the elk drink, and the one the bears swim in? Wildlife is not charged for any of that. You have it in here being charged to livestock. Are you prejudiced, primarily against livestock? Are you and your staff, are you people prejudiced against seeing a cow out there?

Gerry stated if we were prejudiced against livestock, we wouldn't have gone from what the model picked at 383,000 AUMs up to 350,000 AUMs.

Louis said that you don't go up from 389,000 animal units to 350,000.

Gerry corrected himself by saying he meant 289,000 to 350,000. If we were, we would not have done that, which is one of the things I could say to that effect. As far as the values like you are talking about, the wildlife paying for the water they are drinking and that sort of thing, as far as the modeling aspects of this thing, they paid for it.

Mr. Biebel asked, "how?"

Gerry stated that it gets into an awful lot of complicated bunch of stuff.

Mr. Biebel stated that he wanted it on the board. We are back to this \$21.00 a day. That is fantasy - like Santa Claus and his reindeer.

Louis said to charge them and then we would see how much wildlife they would need.

Gerry said that in like respect, the 57.18 that we used for the value of the cows is a fantasy too. All of those benefit values that we have in there are in there to give us an indication which way to go but they are not making the decision. I think if we get too hung up on benefit values on the whole thing, we will lose the whole point of what we are trying to do. They aren't driving things - I mean they aren't making things happen. They are put in there so we can see relative differences between areas on the Forest from the standpoint of which areas we can get the most bang for our buck, but that is what they are really put in there for. They really aren't put in there to say who is going to get the most on anything. That is being set by the people that are making the decisions on the Forest.

PERMITTEE MEETING

Tom Klunker stated that in the proposed Plan, in the future, you are emphasizing wildlife too much, I think, especially the Elk end of it. You have a set number of cattle AUMs, all fenced in, which you supposedly take those out and replace with elk. You aren't going to keep the elk in those fences. You aren't going to be able to control the WAUMs. You can control cattle, but never will you be able to control the grazing on the Gila National Forest. I can't see where anyone in the Forest Service is a good enough cowboy to keep these elk where they are supposed to be.

Gerry said that they did try to look at herd units on elk. I think that is another area where we can improve. If we had some places where we said there is an isolated area where elk are going to increase and cattle are going to go down, and you feel like if we do that the elk aren't going to stay there, that they are going to move out and screw everything else up too - those are the kind of comments that we need so we can look at those areas again and see if that is really the way we think we ought to be going. I think what you said before, in terms of wildlife getting the upper hand on this thing, like we talked about, that's the opinion that you're raising and it's a concern that you're raising and I think most people in this room are raising the same concern, but on the other

hand, we have other people saying that wildlife are not getting its fair share. So, it all boils down again to being able to come up with some appropriate mix.

Dave Vacker asked Gerry how the Forest Service is going to make the final decision? Are you going to put all these comments together in one, two or six months, whatever it is, and then come up with the alternative that least detrimentally impacts everybody, or are you going to set some priorities to where we want to keep grazing at this level and hope that it doesn't impact others? I still am not clear how you are going to come up with your final alternatives and final priorities on this. Otherwise, you're not going to do anything. You are going to get so bogged down in the complexities that you are just going to have a useless pile of paper there.

Gerry stated that it would be somewhat of a subjective process, the way I envision it anyhow.

Dave then asked how it would be subjective - how will you make these alternatives, because you are going to have to trade things off? That's what I still don't understand, how you are going to derive that tradeoff?

Gerry said all we can do is sit down and look at the data that we have and look at the kinds of comments we are getting and try to come up with something, again, that we feel is equitable. I grant you that that makes it a pretty subjective process, but again, I guess, my challenge to you is if you can come up with some better way to do that, I and Ken too, is more than willing to listen to what you are suggesting as to how to pull all this information together and come up with something that people can live with.

Tom Klunker maintained that we ought to plug people like Terrell Shelley, Roland Rice, Don, and those most affected people - I think you ought to plug them into the computer and see where all this rings out. You are not using their vast decades of knowledge on this land. I don't think this is plugged into that computer. I think you need to consult with the permittees, especially these people that have been here for decades, on actual range management and wildlife management.

Gerry said that that is one of the things they are asking for now from the standpoint of comments - the kind of information you are talking about. I don't know really what else I can say to that.

PERMITTEE MEETING

Walter Biebelle said that it appeared that the allotment management plans are being superseded by other ideas at particularly no cost to anyone except the people involved on the ground. Therefore, I feel that your approach and interpretation of the laws requiring you to make this plan be looked at in toto and not be giving preferential treatment to certain individuals, which theoretically you have applied a monetary value to, which to date you have collected not one red cent other than from donations from these people.

Gerry asked if what he was saying, or what he is hearing him saying, is that those people that aren't right now contributing to the National Treasury from the standpoint of contributing fees to use the National Forest lands should be basically ignored.

Mr. Biebelle said not ignored, but not given the value they have been given in this report.

Louis said, "Not put ahead of us".

Gerry stated that in that respect, "What I need from you in a comment is what level you feel you should be at and what level you feel other uses should be at."

Louis said that they all agreed that these "freebee" users should not come ahead of those of us who are paying our way and producing a useful commodity for the United States people. We are producing food, fiber, lumber that is needed by the people and yet our playing segment of our society - their wants are being put ahead of ours. I personally feel that livestock numbers can be basically level. I don't doubt that there are spots on the Gila National Forest that need adjustment, possibly need some cuts, and we have places that could stand some raises. I sincerely regret that we no longer have an Advisory Board capability of going out with the Forest Service and looking at these points that the Forest Service thinks needs some adjustment. In the past we had this. I feel that it worked real well. There were instances where, maybe due to some Forest Service personnel getting his ego bruised, he wanted to cut a permit. The Advisory Board would go against him. I know of a specific instance where they wanted to cut a permit and the Advisory Board recommended instead that they raise it and they finally did. I believe that in most instances and in more than half of the instances, when the Advisory Board was called out to look at a proposed cut, that the cut was recommended. In most instances, the Advisory Board went out and looked at the land, the care that was being taken of it and I think these are the people who are qualified and I think they did a real good job. I think it is a shame that it is no longer being done.

Joyce Biebelle asked if she might read something concerning the ranchers paying their own way. This comes from the National Inholders News. "Advocates of higher grazing fees claim the present system is just a subsidy paid to ranchers by tax payers. Their rationale cites 1983 figures showing that Federal Agencies collected about 24.1 million in grazing fees, but spent 60 million for land management and revenue sharing with local governments. This appalling imbalance easily convinces the average citizen to support higher grazing fees until the whole story is told. The fact is that the Federal Government spent only 16.7 million of that 60 million on range improvements, i.e. activities related to forage production. Forage is all that ranchers bought with their 24.1 million, thus, ranchers gave the agencies an actual 7.4 million profit from grazing income. The agencies spent the other 43 million dollars on non-ranching activities, including climbing inventories, programs such as recreation, wildlife habitat rehabilitation and protecting wild horses and burros, and they paid the salaries of an enormous bureaucracy that no rancher in his right mind would hire." She stated that this is where some of the money goes

PERMITTEE MEETING

Mr. Klumker felt that it was really disheartening to the permittees out here to see the few dollars being spent on range improvements, which maybe is all right for what money is being put back into them, but when we see the rest of the Forest spending millions upon millions of dollars for fire protection and this and that, I guess we sit up there day after day seeing car load after car load and lot of times pickup after pickup with Forest Service personnel running here and there with no purpose in mind, doing menial tasks, we really get disheartened. We are seeing these big bucks being spent, but yet we seem to be always the whipping boy.

Roland Rice stated that he keeps seeing the Forest Service cut one allotment after another and across the fence in range that is comparable, your cuts are not consistent.

Gerry said that if that was the case and you think we have done that, he felt that is the kind of stuff we need to know. There are some real possibilities that there are some mistakes in the Plan that we can correct through getting that kind of input from people. The data set that was used to do this thing is almost two million lines long, so you can get some idea of the possibility for error within that base.

Dave Vackar stated that he felt sorry for Gerry and Ken and the Forest Service. To a large extent, it like the tail wagging the dog. A lot of the blame should be placed on Congress for requesting a Plan without providing the Forest Service with any definable goals or objectives. It seems like you are just kinda wandering around here in a dark room hoping to come out with something that will semi-please everybody involved. I don't think you are ever going to accomplish anything in this process. By the time you get it finalized there are going to be so many new variables and new things out here, that I don't think you are going to end up with anything that you're satisfied with, much less anyone else. I think Congress should bear some of the brunt of that. It would be easier for you all and everyone involved, although I wonder if Congress is the correct place sometimes. You really don't have any definable goals or objectives here on the Gila National Forest or the whole Forest System, I don't believe, other than some board general philosophy of managing for the good of everybody and that is so broad that you are not going to achieve that.

Gerry told Dave that that was a real good point. What happened with the National Forest Management Act, though, we are trying to view it as a "last chance effort" for us to try to manage the land rather than having Congress manage the land. We don't feel, like you said, that Congress would be the appropriate level for that to be done. If we really get into that arena, I don't think anyone really gains, so I think there is really a lot of underneath kind of incentive, if you want to call it that, for us to be able to get with you all and to get with other people and to somehow or another pull this thing together so that it will work. Otherwise, that may be the alternative at some point.

Mr. Vackar stated that we seem to be rambling quite a bit now. I know myself and some of the other permittees did not write comments based on getting some additional information. Is that what you would like to have now for the benefit of this draft EIS, is simply us stating our names and citing our objections or input into it before we go here all afternoon?

Gerry stated that that would be fine. That is what we had talked about doing at the beginning, just go through some questions and answers first. If there are not any more questions that deal with the process and there are some additional comments that have resulted from these conversations, we can do that. We can go around and have people give their name and give their comments and then we can call it quits.

Louis Oliver asked if the verbal comments that were being made there now will go on record.

PERMITTEE MEETING

Gerry stated that they would go on record. It might be difficult pulling concerns out of the question and answer session we just went through. When we do go back around, if you can remember what your comments were, go ahead and give us your name and repeat those comments and that way we will be sure to get them in the record and we won't miss anything.

Louis stated that he would like to make another one now. It has been touched upon, but I don't think it has been given enough consideration. In my opinion, probably the worst cause of our range deterioration on the Gila National Forest, to date, has been fire suppression. This again was you fellows' mistake. The ranchers have told you for 50-75 years these fires were doing more good than harm. I realize that you do now realize this and this thing is being turned around, and we are tickled to death about it. But at the same time, again we are

having to suffer for your mistake. I think fire suppression should be a much more prominent consideration in this thing.

Gerry asked that they begin to go around now.

Art Tackman stated that many of the statements being made have been comments. I don't see why we have to reiterate the ones we have already made. If anyone has any additional comments, I think that would be fine, but in the interest of time - we made comments and it is a matter of record. Gerry stated that he didn't have any problem with that. All I can say is that we will try to pick those comments out of the questions and answers as best we can, but there is always a possibility that we could have missed something by doing that, and we will do that. If you want to take that on faith that we'll do the best job that we can pulling those things out, we can just go ahead and go around and get any additional ones.

Art Tackman asked if anyone had any additional comments to make?

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Bill Grubb of Silver City stated that as a permittee of the Gila National Forest, I object to your plan, and I also object to the waste of public money that was used to produce this document of questionable quality and methodology. I would also like to say that I don't think there is any way that Forest Service personnel will be able to go out and make fair unbiased production/utilization studies of allotments when you have already decided in your 50 year plan that there will be a 50 percent reduction in that area.

Roland Rice stated that they had batted back and forth the wildlife and grazing - have you any areas where the grazing has been taken off. Did you consider what you had when they had grazing there and what it is today?

Gerry stated that he did not know the answer to that off hand.

Mr. Rice said that in regards to this, you have areas where in the 30s the grazing was taken out, mainly in McKenna Park and on down Mogollon Creek to about the mouth of Tape Canyon. Granted you have some elk in that area now, but where have your deer gone that were in this area when there was grazing in there. Years ago, I can remember who had the hunting lodge at that time, but they would take parties up and camp in the mouth of the Johnson and Paw Meat area and hunt primarily deer, and now there isn't enough deer in that area to pay to go back to look for now. Is the same thing going to happen when you reduce these permits and take the cattle out? Is the amount of deer going to follow out in the same manner? In these areas that you are reducing 60 percent and areas 50 percent, I have a neighbor out there that if you cut him 50 percent, you might as well cut him the 100 percent right now, because its going to do the same thing to him. It will put him out of business.

Gerry stated that what he was hearing him saying is that you are concerned that if the ranchers go out of business, then the deer are going to go along with them because there is a direct relationship there that we really haven't dealt with very well.

PERMITTEE MEETING

Louis Oliver stated, "absolutely".

Mr. Rice stated that was what happened to the areas just north of them.

Louis stated to Gerry that there is a prime example of that in the Gila Wilderness on the old Heart Bar Ranch, the McKenna Park area that Roland was just talking about. Its known all over the State as a very very poor place today to go hunting. Everybody goes in there thinking that they are going to find super hunting because the cattle were taken out. I don't think the elk should really be considered because elk were not in the area at the time the cattle were taken off. This is a new addition. The wildlife that were here when the cattle were taken off have almost disappeared out there. I have hunted in there a number of times myself.

Mr. Rice stated that he didn't know if it had anything to do with it, but even the elk, the numbers that have been killed and been taken in this area the last few years has dropped when compared to what it was when they first opened the area up to hunting. Your Game Department officials will verify that.

Louis said that as a personal testimony on that, I've hunted elk in the McKenna Park area now, off and on when I get a permit, since 1962. I think it is one of the most beautiful places I ever went to in my life and one of the most enjoyable trips, but the hunting is terrible. This year I was lucky enough to get an elk permit again. I'm not going back, I'm going to a cow ranch this year because of the poor quality of the hunting in there.

Gerry asked if there were any other comments.

Walter Biebelle stated that the Biebells have been on the National Forest since 1911. This process of managing the resource by the Department, basically has ended up in almost a disaster. It you wanted wildlife prior to the range rotation management system, in the Black Range there was quite a bit of it. When you went to your rest-rotation program, you concentrated you livestock - the game moved with the livestock. They didn't stay when the cattle went. Today in the Black Range if you want to hunt you had better be a professional, a little more than a professional, because the game is not there. The areas where the cattle have been taken off, which is on the east side of the Black Range from Millsboro Peak south to Trujillo and to Drummons, there are no more deer there than there are on this side of the crest trail where there are cattle. Therefore, I feel that your document has singled out the single issue of livestock grazing and has not give consideration to the fact that permittees went along with the new concepts of expert management of livestock and the Forest Service failed to do the following things: 1) correctly interpret what they saw. 2) were very biased in the direction they thought they wanted to go not being professional people, except in their own particular line of endeavor. And that was building a good name for me and "to hell" with them, and I point directly to you or Scoggin, to whoever happened to be - Scoggin is going to retire next month or a couple of months from now and he can laugh about this. He graduated from New Mexico State so I'll pick on him, he is prejudiced. What he is doing and what he is doing here, he was not taught, he was told, and this is what we are trying to find out, therefore, we think that you are very very prejudiced towards your own nest and your own operation. Therefore, I feel that this should be thrown out and should be reconsidered on a more fair and equitable basis and be realistic, not theoretical. Thank you.

Gerry asked if there were any more comments.

Francis Biebelle asked if they were going to count the comments?

Gerry stated that is was not a popularity contest - We're getting a lot of comments from all sides.

Mrs. Biebelle asked if they were counting the environmentalist against them is what she was trying to know.

PERMITTEE MEETING

Gerry said, no, it's not a number counting kind of thing.

Vernon Hollimon from Glenwood stated that it had not been brought forth here that no one can make a decision anymore in the Forest Service. You've got to study this, you've got to study that. You all have capable people. You have people capable of making decisions. If the permittee or contractor or hunter or somebody asks a question or wants something done like powerline right-of-ways, right-of-ways for permittee's roads, just to walk a cat over to fix a road, its taken too much of our resources that could be used for management and getting projects done in the study course of this - nobody can make a decision. Consequently, the money that is filtering down to us, as a permittee or for projects and stuff are all getting spent before it gets down to the nitty gritty and gets the job done. There ought to be some figures somewhere - I imagine a small road job - I bet 50 percent of it is already gone in the study and the engineering and the EIS, etc. before it actually gets down to the actual on-the-ground work that's done. I think it's lost - that money is being lost to actually benefit the waters for the livestock, the increased grazing that we might have, the fence that we need built and the roads that could be built down there. I've lived there all my life, I'm a very avid hunter, and we go into this livestock versus wildlife - you can't increase the deer herd when they are hunting them like they are hunting them now. I was probably raised on the best deer hunting place in the world and I won't even go back out there right now because there are so many people out there - its so saturated during the four or five hunting seasons they have out there right now that its not even worth going out there. So, why don't you all, or somebody, address the Game Department to go into a better management or decrease the pressure on these animals. I don't care how many cattle you take off there, you are not going to increase and make better hunting by taking the cattle off. There are other measures.

Gerry said that in terms of his comments, he guessed he heard him make two points - I think I heard you say that you didn't think we should be doing plans. Is that correct?

Mr. Hollimon said he wanted us to decrease our overhead volume. There is too much administrative cost.

Mr. Hollimon stated that there were people in the Forest Service that are very capable people, but they can't make the decisions.

Gerry said that with the Plan in mind though, in terms of directing the comments to this thing to try and make it better or whatever, I guess I don't know exactly how to relate that just to this Plan.

Mr. Hollimon said that we were too heavy on our plan. You should do the work out in the field. You have capable people to make the decision that can't make the decisions. Its all got to be made here or in Albuquerque or in Washington. You let those people out in the field make those decisions. They're the ones out there - They're the ones that know what is going on. You people in here, you people in Albuquerque, you people in Washington, you can't make a decision there to affect these people out here in the field. And that goes for your District Rangers, your timber people, your construction people. Give them more authority where they can make better decisions and work with the people.

Gerry said that he guessed the second thing he heard him say if he could kind of paraphrase it was - that you thought that even if we do get something on this thing done, as far as the wildlife is concerned, that really without getting the cooperation with the

Game and Fish to try to institute some kind of permit system or something for deer that we really wouldn't be able to deal with increasing the populations of deer.

Mr. Hollimon stated that if it continues the way it is now, in five years you won't be able to kill a deer, I don't care how many cattle you take off the National Forest.

PERMITTEE MEETING

Tom Klumker said that Vernon made a good point and I think you really need to consider this in your Plan. When you get all these hunters out there and the damage they are doing to the soil erosion, making new roads - I can show you some unbelievable tracks made in the last few years just by deer hunters. The Forest is going to have to recognize, with increased public pressure for consumptive and non-consumptive recreational use on the Forest, the amount of resource degradation that is going to take place. It is going to be tremendous.

Gerry said so if we do go to something, say, that does emphasize wildlife more, we need to put more restrictions

Tom said, "You bet". You are going to have closed roads and you are going to see a tremendous increase in soil loss, which by the way in the draft Environmental Impact Statement you also single out the livestock industry as one of the major factors in soil losses. This is conjecture by whoever put it in the book.

Louis Oliver said that what Tom has just said comes around full circle again to what I have said. He is talking about the environmental damage out there - these people hunting out of vehicles - that should be the responsibility of the Game Department, but they won't accept it. I have talked to them about it. They say they can't do anything about it - about hunting from a vehicle, when it is specifically against the law. These vehicles are doing a lot of damage in my area.

Walter Biebel said he had one more point that should be considered and should probably be given a little more thought, and that's on trespass. When one of these "do gooders" cuts a fence, the cows go through it or the elk run over the fence and cows go through it - in your Proposed Plan, the allotment owner will be trespassed and fined. This is a statement in your book here and I think it should be eliminated completely.

Louis stated that they did have a lot of fences cut by hunters.

Upon being questioned as to what page he read that on, Walter Biebel said it's in there, you wrote the book, you find it. Where is your trespass, where is your allotment people? He asked Ron Biedsby where it was and Ron replied that he didn't think it was in there. He knew at least it wasn't on the Mimbres District.

Gerry said that they would go ahead and take a look at it and see if it's in there.

Biebel emphatically stated it was in there because at the meeting where we had different representation of the different cattle association and growers and organizations in the State of New Mexico and it was brought up. I can't tell you what page it's on, but it is in there and it's implied - if it's not there in black and white it was left enough room in there so that it would be considered as such.

Dave Vacker requested that his previous questions and comments be applied to the record. I would also like to say that if you are going to request valid input from individuals and organizations regardless of what their orientation is, I think you have a responsibility to come out with the better FIS that is in more non-technical language, at least at the end of your technical chapters, provide a better non-technical summary for the average citizen to be able to assess and then give you better comments, because I think you have a document that probably technically is expertise, but we're not all range scientists or wildlife scientists or whoever you used here, and we don't all have MS behind our names. I think you do have a responsibility to provide a better document that the average citizen of us can assess and give you comments back on.

Francis Biebel said, when you are out getting opinions, go to all these banks and find out how we stand with them, and you will find out that it's quite an economic problem because we won't be able to pay off our loans, and that is pretty serious for the whole economy.

PERMITTEE MEETING

Danny Fryar from Reserve stated that one thing that bothered him is when we are grouped into these different levels, as you say you are going to go through range analysis procedures to eventually determine if the 30 percent cut is needed or not on a particular allotment, well I think there should be something written in there to where these range people aren't locked into that 30 percent. When they go out there and the wildlife isn't there that is supposed to be there, then we can use more numbers in the livestock. On our particular permit, we are slated for a 30 percent cut. The Range Com there says that when they look at this they will be considering it as a 30 percent cut in favor of wildlife. Another thing that bothers me, the way I understand it, he didn't particularly say it, is that wildlife dollars will be used on these allotments. We're going to go from a level D back to a level B, which would mean there would be no improvements maintained. I think if the permittee himself or the Forest does get money in the future that that should also be a factor in determining this and give them a way out and say, "well, you're slated for a 30 percent cut and improvements are deteriorating and that's the direction it's going. You are showing a double wildlife figure on our allotment and a lot of these have reached it already and we haven't gotten an increase. In fact, I believe we've got less wildlife than you're showing in this particular allotment. But the improvements need to be maintained and I don't feel that you ought to let all these allotments go even though they are on a level B. I think that you should still maintain some of these improvements, because if you don't, then your wildlife numbers are going to decrease also. They're not going to double. Once you go back to an open range type basis, well then, your wildlife won't be there either. Your trees are going to grow back in these pushes and your tanks are full of silt and they won't be maintained.

Gerry asked if he thought there should be something added to the plan someplace that says if additional monies become available that we should try to do those kinds of things and also to insure when we go through the allotment analysis process that those kinds of considerations will be made. That the target won't be that 30 percent like you're talking about?

Fryar said, "Right." That they aren't going to hold us to that 30. If we got out there and spend our own money and improve these ranches, which most of these ranchers will do if they have the money and times get good. For instance, if you don't have the money to do it, they're going to clean the tanks, they're going to keep the fences up, and also, I don't think just because you spend the wildlife dollar out there that we should keep the livestock from using it, because we've spent livestock dollars and wildlife is using it. That's another important factor.

Gerry said "so if we put in wildlife waters or something like that - don't fence out the cattle?"

Fryar said, "Right". Let's use it for everyone and then get together with the range people, with the ranchers. Don't try to fight him, say, "Let's get together on this", because if we work hard then everything can benefit. I would like to see us loose this."

Gerry said that he hated to see that too. I think we have real good cooperation with a lot of you folks on a lot of things we're doing and I don't want to see this Plan end up

changing that. I think we want to continue to do everything that we can do to make sure that we can get the most of all of these kinds of things. That depends on us working and using your expertise, as much as you're using our expertise. I think we will continue to try and do that. I guess what I hear you saying is that we should put something in the document that says that we are going to continue to do that.

Fryar said, "Right, continue a joint effort in wildlife and ranching." Make a way for these people when they go out to analyze these ranges to say that we got more forage here than what we need for wildlife and livestock. Let's increase livestock at this point - you know, be able to do this and not let them go out there with it in their mind that well, this is slated for 30 percent cut and we're not going to increase any livestock.

PERMITTEE MEETING

Gerry stated that that is our intent. If there is more forage than projected, both wildlife and livestock should benefit. I think that maybe we haven't done a real good job of putting it in there the way we need to put it in there. I think it is something that we can surely work on.

Danny Fryar said that it must not because the range people don't think its that way. I didn't either.

Tom Klumker stated that the Forest Service was always the judge, the jury and the prosecutor on these cuts over the years and they probably still will be in the future. I would personally like to see the expertise of the rancher being used. He has often been there years and years and he lives on that land day after day, year after year, and yet you're coming in with probably a lot of times with fresh recruits out of college that have never seen the ranch, and yet, that standard allotment analysis is going to carry more weight than what this rancher could ever say. Its not fair and it never will be until the system is changed.

Gerry asked if somehow or other we need to build in more cooperation so that we're dealing more with the rancher on those kinds of things?

Tom said, "You bet". I think the rancher's expertise should carry as much weight as the standard allotment analysis procedure.

Louis Oliver said not necessarily the rancher, but I would suggest a group of ranchers. Again, back to something like the Advisory Board used to be. Gerry, another thing I would like to suggest and I'll be as brief as possible, you have indicated that some of these permit cuts may not take place. Could you put this into specific words, that if an allotment does not warrant a cut, it will not be cut? Can you state that openly and specifically?

Gerry said he didn't see any reason why not. We'll have to look at the way we have it worded and that sort of thing and see how we can work something like that in there. I can't make any promises to you right now because I'm not the one making the decisions, but I think we can do something on that.

Louis stated that he would like to suggest that this be done.

Gerry said that there were a whole lot of comments in the comments we received from the field of grazing interests and from the New Mexico State Department of Agriculture that deal with wording and things. I think that we may be able to try and find somebody that we can deal with in your organization and try and get those wordings straightened out so they're acceptable to you as well as acceptable to us before we come out with the final.

Bill Allen asked what their time frame was.

Gerry said we are looking at somewhere around March as being when the final will actually be printed. It takes about 60 days to print it, so somewhere around July, I guess.

Bill asked if they would have a chance to look at the final before it was printed?

Tom Klumker asked if there was going to be a comment period?

Gerry said there would not be a comment period before it was printed, but there is no reason why we can't communicate back and forth with you all and tell you what is going on.

Klumker asked if this is contrary to law to submit a final plan without final comments, so to speak?

PERMITTEE MEETING

Gerry asked, "Contrary to law to implement it?" Is that what you're saying? What we'll do is go ahead and do a final, and from the legal standpoint what we do is do the final and we send the final out and there's a period of time before we implement it. During that period, the appeals process is open. Before that, the public comment period kind of ends, well it ends October the 8th, but after that period, we don't want to shut off communications with you guys. We've talked about that a little bit in here and that is true of other publics that we are dealing with, because if we do that, we're never going to get where we want to get on the thing. So I think we need to maintain some dialogue back and forth and we can try to let you all know what's going on and where we are at in the process and what kind of changes we're making and those kinds of things in the hope that we can get some place that is acceptable on the thing.

Bill Allen asked if you aren't required by any statute to have a final by March, 86, I think you should go back to the drawing board and come up with another draft and let us have a shot at it, as well as the other folks.

Gerry stated that the law that was passed said that we had to make an attempt to finish all plans on National Forests by September 30, 1985, so the intent date is already passed. Our intent was to do that and its still to do it as fast as we can get it done. I think as a result of that it would be very difficult to go back and start with a new draft. We can make changes between the draft and final, and we do not think another draft would buy us much.

Tom Klumker stated that recently the Forest Service and BLM have a joint 4.8 million dollar, I believe, study that was thrown into the trash can by Congressman. Its too bad that Congress can't get their act together and, the public agencies get their act together to produce better results out of these expensive documents.

Gerry asked if there were any other comments?

Inasmuch as there were no other comments, meeting was adjourned.

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Dear Gila National Forest Supervisor,

I am writing to inform you that I am in full support of the Earth First! plan for the Gila Wilderness which preserves 12 roadless areas, closes several roads including the North Star Rd, and proposes specific plans for the management of this important Wilderness.

I am also committed to work voluntarily with the Forest Service to achieve these goals. Please send me advance notice of any plans that affect areas of this 1.3 million acre (approx.) area.

Thanks,
B. Lagorio

BRAD LAGORIO
2405 Meadow Rd SW
Albuquerque NM 87105

Please see our response to letter number 2, the Earth First comment containing their suggested alternative.