

Comment:

Over the years I have greatly enjoyed almost every unit of the Cibola National Forest – and I hope to visit the Grasslands in the future! I appreciate your management and stewardship of these lands. Most of my use of the Forest has been recreational, but in my professional capacity I have visited many archaeological sites and other cultural resources. Thank you for your management of these resources.

For the revised Forest Plan, I hope you will consider “uses” of cultural resources alluded to but not specifically named in topic area 13: “Cultural and historic resources and uses, native knowledge and ethics.” That “use” is research. I hope the revised Forest Plan will encourage thoughtful archaeological research conducted sensitively to Tribal concerns. Archaeology today is learning remarkable, surprising things about the past and the national heritage – with minimal impacts. We can learn a lot from a little.

There are sites of great importance in every district of the Cibola National Forest. Public and Tribal interest in learning about the region’s past has never been higher. And a new generation of young archaeologists – trained in Tribal collaboration – is primed to write new chapters for our national heritage. Collaborations between the archaeologists and CRM professionals of Cibola National Forest, and universities & research institutes, and Tribes could do great things with minimal impact. New knowledge will enhance the Forest’s management of cultural resources and will almost certainly provide interpretation for a public increasingly engaged with cultural resources – “heritage tourism.”

Comment:

We hope that livestock grazing will be an issue of concern and that the CNF will consider revising its forest plan to allow for allotments to be closed to livestock grazing for resources protection permanently by the responsible official.

Comment:

First, I believe that consideration should be given to modifying the aum's for the Zuni Mountain area grazing allotments. This fall I sponsored a grazing assessment seminar with Dr. Mary O'Brien, grazing guru for Grand Canyon Trust and the Three Forest (Dixie, Monte la Sal, and Fishlake NF's) collaboration group in southern Utah. The seminar was for my group the Rio Grande Valley Broadband of the Great Old Broads for Wilderness and the location was in the Zuni Mountains. In order to convince Dr. O'Brien to do the seminar, I took photos of two areas in the Zuni Mountains. One area was a meadow on private property that had not been grazed for around 40 years, and served as a reference area. The other was the Paxton Springs road area nearby, which is heavily grazed, and served as an example of poor grazing management. While I am not sure how much of the land along Paxton Springs road is private and how much of it is public, but it was easy for the group to see a significant difference. This difference is about the same for both private and forest service lands in the area that have continued to be grazed in the last 30+ years. I am including a link to a photo album that I created to document both areas, so you can see the difference in the areas. I tried to label things as accurately as I could. There are also photos from several different dates, including some from the late 70's and early 80's of the same area (Bad Road meadow - yes, that is the official name, and yes, it can be a significantly bad road in mud and heavy

snow seasons.) I wanted the photos from the earlier decades to show how much improved the condition of the meadow is after being ungrazed for 30+ years.

I do have several documents provided to my group by Dr. O'Brien on the effects of grazing in the southwest and the west, and would be happy to provide you with links to them.

The second issue that concerns me is that the forest service planted many ponderosa seedlings about twenty or so (?) years ago along FR50 (Zuni Canyon Road) near the beginning (north end) of the Paxton Springs road, among other areas. They have been growing like gangbusters, but are now far too close together and need to be thinned. In the grazing photos (see photo album referenced above), see photos numbered 51 and 52 for evidence of the area needing thinning. I would think that this might have been addressed by the Zuni Mountain Landscape Restoration Project, but I can find no evidence that they have any intention of thinning that far east. Actually, a great deal of thinning needs to be done on the private lands also, especially for section 1, but I am sure that is outside of the forest service's domain. Is it also outside of the landscape restoration's domain? Is there any other agency that could help private property owners thin their land? It is a wildfire debacle waiting to happen.

Comment:

(known as the Loop Road - Forest Rd. 445- in the Placitas area) was studied carefully a few years ago. After the study and a lot of public input, the land bound by and contained within the Loop Road was designated a protected NRA with the approval of the Forest Service.

Those community members who worked long and hard to get this protection are now wondering why the Cibola Forest Service has not been enforcing this NRA at all. In fact, within recent years it has even sanctioned and increasing number of mountain bike trails in the NRA - even including improvement of illegally poached bike trails. No mountain bike individuals have been ticketed for these illegal trails. The protection of this land now depends on the few who are watching it change rapidly without public input. We are forming a group of concerned citizens and will meet with the Tijeras office this Spring.

The Tijeras Cibola Forest Office also has allowed an informal trail mileage map created by private citizens to be posted on Forest Service signs at two parking lots. A great number of the trails on this map are within the NRA and the Tijeras office has not done anything about it. The Tijeras Cibola Office also supports a volunteer group of recreation enthusiasts including mountain bike users who call themselves Placitastrails.org. They believe they have authority to work on trails as well as widen parking areas that never existed until recently, including many in the NRA area, and apparently they are doing this with approval from Mr. Wood. Yet there has been no public survey of what area users of that land would like to see, nor meetings to address these concerns.

Comment:

Over the years I have greatly enjoyed almost every unit of the Cibola National Forest – and I hope to visit the Grasslands in the future! I appreciate your management and stewardship of these lands. Most of

my use of the Forest has been recreational, but in my professional capacity I have visited many archaeological sites and other cultural resources. Thank you for your management of these resources.

For the revised Forest Plan, I hope you will consider “uses” of cultural resources alluded to but not specifically named in topic area 13: “Cultural and historic resources and uses, native knowledge and ethics.” That “use” is research. I hope the revised Forest Plan will encourage thoughtful archaeological research conducted sensitively to Tribal concerns. Archaeology today is learning remarkable, surprising things about the past and the national heritage – with minimal impacts. We can learn a lot from a little.

There are sites of great importance in every district of the Cibola National Forest. Public and Tribal interest in learning about the region’s past has never been higher. And a new generation of young archaeologists – trained in Tribal collaboration – is primed to write new chapters for our national heritage. Collaborations between the archaeologists and CRM professionals of Cibola National Forest, and universities & research institutes, and Tribes could do great things with minimal impact. New knowledge will enhance the Forest’s management of cultural resources and will almost certainly provide interpretation for a public increasingly engaged with cultural resources – “heritage tourism.”

I have discussed sites on several units of the Cibola NF with Tribal representatives and there appears to be genuine interest in learning more about these sites. For example, the Gallinas Springs site in the Magdalena District: this site is remarkable both for its size & spectacular location, but even more for its pottery, which closely resembles pottery at Mesa Verde National Park (250 miles to the north!). I recently completed a minimally invasive project on a similar site at the head of Alamosa Creek, just south of the Cibola NF; and a team from Arizona State University is wrapping up limited research at a third such site a bit further south. Those three sites, with their “Mesa Verde” pottery, may correspond to traditions of Laguna and Acoma Pueblos of three clans that migrated far to the south, and later re-joined those Pueblos. This is one of many areas of potential collaboration between Tribes and archaeological researchers, with real potential for public interpretation (and appreciation) of both Tribal and archaeological perspectives.

As you know, there are many thousands of cultural resources on the Cibola National Forest, and the NF has done an excellent job managing and conserving these resources. I hope the revised plan will specifically mention the possibility for archaeology research and collaboration.

Comment:

I hope the new plan preserves the scenic and wilderness character of the areas of the CNF that have yet to be developed. There are areas that have not been designated as wilderness, yet possess many of the same characteristics as designated wilderness areas. One such area is in the San Mateo Mountains adjacent to the Withington Wilderness. I found that area to have many of the characteristics of wilderness.

Having large tracts of wilderness in relatively close proximity to our state's major population center is important now and will be more so as the population grows.

Comment:

- 1) Fire Closures: Is there a method to limit the size of a closure? For example, Big Block approximately 4.5 miles south of the Tijeras Ranger Station is less than 100 yards from South 14. If there is substantial danger north of I-40 could this local area remain open?
- 2) Raptor Closures: The entire Shield is closed between 1 March and 15 August. It appears the closure is traditional at present. What about limiting the length of the closure and / or the physical size of the closure.
- 3) Lower La Cueva Picnic Area: The picnic area is currently closed between late October until May of the next year. Both hikers and climbers would use the trailhead for a longer season if not closed. What are the chances of making the closure only for the coldest portion of winter?
- 4) Fixed Anchor Policy: The Cibola National Forest, and NM Crag + NM Mountain Club + Access Fund discussed this issue in August 2010. It would be fruitful to use the guidelines discussed at these meetings in the new forest plan revision. Specifically, reasonable fixed anchor use is both appropriate and allowed within wilderness areas.

Comment:

We are particularly concerned about the increasing prevalence of ORVs (and motorized dirtbikes) on public land. The damage to habitat is tremendous. When we go hiking we see deeply rutted areas with no grass and prime for erosion. Also the noise from motorized vehicles ruins our opportunity to experience the quiet save for the sounds of birds and the rustling of trees.

With the prediction of pervasive draught in the southwest our forest and grasslands will be even more vulnerable to the destructiveness of motorized vehicles. Let's make preservation of habitat and quiet places the primary goal of the Forest Plan.

Comment:

The New Mexico Archeological Council is thankful for the opportunity to comment on the Cibola National Forest revised management plan. NMAC has focused commentary on topics 7 (benefits people obtain from the forest) and 13 (cultural and historic resources), and has offered additional comments related to current legislative threats to the Forest. Many NMAC members and readers have carefully considered the issues for consideration and have offered commentary. This letter is a compilation of membership commentary.

1. The 1985 Forest Plan does not address establishment and oversight of Traditional Cultural Properties, an understandable omission since the 1985 Plan was written prior to enabling legislation. The new Plan must present robust mechanisms for qualifying, delineating, and monitoring Traditional Cultural Properties. The development of such mechanisms must include Tribal and professional consultation.

2. We applaud Cibola National Forest for its attention to diligent recording of heritage resources throughout the Forest and recommend that Forest management continues to sponsor landscape-level inventory surveys and analysis of historic properties across the Forest. Such actions must be conducted with sensitivity to Tribal and public concerns. Archeological inventory surveys must be conclusive and recommend readily executable treatments for threatened properties. We note the absence of ethnological and ethnographic survey in the 1985 Plan and strongly recommend the inclusion of oral and photographic recording methodologies in the new Plan.

3. Research permits on the Forest should be issued in a timely manner to qualified applicants, especially in areas of the Forest where site security has been or may be compromised. Appropriate interpretative results of research on the Forest should be utilized aggressively to foster more public archeology programs aimed at informing and educating all interested New Mexicans. Public archeology programs may include partnerships with NMAC, ASNM, Tribal components, and members of the New Mexico legislative body.

4. Cibola National Forest must take a leadership role in addressing Forest management concerns that have been widely publicized by politicians who would eradicate Federal control of the Forest. Leadership actions would include the formation of one or more committees that would actively monitor legislative efforts to displace Federal management of the Forest for the benefit of accelerated for-profit extraction interests without consideration of effective cultural resource management. The Forest must take an active role in commenting on and lobbying against such efforts.

5. Summary updates of analyses and treatments must be made available to all New Mexico Legislators so that they may better evaluate the effects of legislation that may directly impact Public Lands. A Legislative email list should be assembled and communication with Legislators should be frequent.

6. NMAC applauds efforts made by Cibola National Forest toward effective Forest management. However, Forest management must aggressively analyze and correct the perception of Federal management short-comings in order to bolster public appreciation of the Forest and to help deter legislation that would re-distribute Forest management to the State level. Such corrections may include effectively disseminating information that better equips public and legislative individuals and bodies for formulating opinions regarding Forest management.

7. I have included below an excerpt from the commentary of NMAC member Dr. Stephen H. Lekson, Curator and Professor of Anthropology, University of Colorado Museum of Natural History:

For the revised Forest Plan, I hope you will consider “uses” of cultural resources alluded to but not specifically named in topic area 13: “Cultural and historic resources and uses, native knowledge and ethics.” That “use” is research. I hope the revised Forest Plan will encourage thoughtful archaeological research conducted sensitively to Tribal concerns. Archeology today is learning remarkable, surprising things about the past and the national heritage – with minimal impacts.

I have discussed sites on several units of the Cibola NF with Tribal representatives and there appears to be genuine interest in learning more about these sites. For example, the Gallinas Springs site in the

Magdalena District: this site is remarkable both for its size & spectacular location, but even more for its pottery, which closely resembles pottery at Mesa Verde National Park (250 miles to the north!). I recently completed a minimally invasive project on 3 a similar site at the head of Alamosa Creek, just south of the Cibola NF; and a team from Arizona State University is wrapping up limited research at a third such site a bit further south. Those three sites, with their “Mesa Verde” pottery, may correspond to traditions of Laguna and Acoma Pueblos of three clans that migrated far to the south, and later re-joined those Pueblos. This is one of many areas of potential collaboration between Tribes and archaeological researchers, with real potential for public interpretation (and appreciation) of both Tribal and archaeological perspectives.

NMAC is hopeful that the revised Cibola National Forest Plan will aggressively address the seven points listed above, and is ready and able to help in any way it can.

Comment:

I am a Preservation Archaeologist at Archaeology Southwest (formerly the Center for Desert Archaeology) a private, nonprofit research organization based in Tucson, Arizona. Archaeology Southwest promotes the stewardship of archaeological and historic resources in the greater American Southwest through research, preservation, and public education.

My research with Archaeology Southwest has involved work in multiple National Forest districts. Past research projects include site documentation and condition assessment in the Apache and Gila National Forests conducted as part of the Southwest Social Networks project. This project is a multi-institutional, collaborative research effort to compile an enormous research database of prehistoric cultural resources in a large portion of Arizona and New Mexico. In addition, as part of Archaeology Southwest’s Preservation Archaeology Field School, we have trained students to document sites on the Gila National Forest, providing information for our research in the Upper Gila region of New Mexico, as well as site management data for the Forest. Finally, I am collaborating with Dr. Suzanne Eckert of Texas A&M University on a research project at Goat Spring Pueblo, an important ancestral Piro archaeological site in the Cibola National Forest, Magdalena District. This project incorporates site excavations, survey, and student training and will result in new interpretations about this significant but poorly understood archaeological resource.

In addition to exploring the research potential of cultural resources within the Cibola National Forest, Archaeology Southwest is concerned with long-term resource management and site protection. In many parts of the Southwest, we have worked with local landowners and various state and federal agencies to help assess and develop protection plans for potentially threatened resources. Regular assessment and management of resources is crucial because cultural resources, especially highly visible archaeological sites, are frequently visited by the public. Unfortunately, these visits may have adverse impacts and sites may be damaged by illegal artifact collecting, looting, camping, or off-road traffic.

In my opinion, periodic revisions to the Forest Plan are essential for successful management not only of the Forest’s natural resources, but also its nonrenewable cultural resources. Cultural resources are important for their research value, but they also have intrinsic heritage value as part of regional and

local histories. They also often have particular cultural or religious significance to many Native American groups. Cultural resources in the Cibola National Forest are particularly significant as they are generally protected from development and other adverse impacts and kept for the enduring benefit of the public.

Comment:

Torrance County Archaeology Society (TCAS) appreciates the opportunity to comment on the Cibola Forest Plan revision. We applaud the Forest Service for seeking input from the public and interest groups so early in your planning process. TCAS was invited to submit comments regarding (paraphrasing):

- 1) What TCAS knows about the nature of archeological, cultural, and historic resources on the National Forest;
- 2) What TCAS knows about the condition of these resources;
- 3) Why these resources are important/significant in local, regional, and national contexts;
- 4) Provide information and documentation regarding cultural resources on the National Forest that TCAS believes the Cibola Forest does not have.

What TCAS knows about....

TCAS membership includes residents mostly from the Estancia Basin who are ranchers and farmers some of whom are descendents of homesteaders, area teachers and businessmen, professionals in natural resource agencies, and retirees from many professions and backgrounds. Concerning archaeological, cultural and historic resources of this region, the TCAS mission statement directs our actions: preserve and protect, educate, encourage, cooperate. Our corporate knowledge and concerns for "Heritage Resources" are, in our opinion, extensive for the Mountainair and Sandia Ranger Districts and on lands of other ownership namely within Torrance, Bernalillo and Socorro Counties and beyond.

We understand that there are large unsurveyed and non-inventoried areas of the Mountainair and Sandia Districts for which the presence and condition of heritage resources remain mostly unknown. This represents a huge potential for adding to the existing significant body of knowledge.

The lands within the National Forest Ranger Districts occupying the Manzano/Sandia Mountains and the foothills, mesas and drainages extending from there are integral to the landscape and stories which was the stage on which human life ways have been played out from 12000 BC (or even earlier) to the present. Our area (especially the Estancia Basin, Middle Rio Grande drainage and Salinas Provence) is famous for archaeological/historical sites that span this period. Sites such as Sandia Cave (Sandia RD), Pueblos Colorado, Blanco and de la Mesa, Cement Spring, Kaiser Sawmill, and others are examples of some of the known sites on National Forest. Represented are site types ranging from limited activity sites (ephemeral campsites or stopovers) to permanent settlements.

Local conversation suggests there may have been a pueblo somewhere on the northwest portion of the Gallinas Mountains. From research done in association with TCAS documentation of Cement Springs and vicinity, the presence of trails and roads from the 1800's was indicated in military records, for example, the military road that James Carleton and his men build in 1855. Carleton's road also left the west Gallinas Spring (later called Cement Spring) and went south to Largo Canyon, eventually reaching Fort Stanton. Since Carleton followed an existing prehistoric trail much of the time, his road has more than just historical significance.

TCAS is aware of many specific archaeological resources that at a minimum need to be relocated, re-documented and re-evaluated. A few examples are listed:

Rock art locations

Agricultural features (historic and prehistoric)

Known and suspected Native American shrines and materials gathering locations (recent)

Pipelines, acequias, trails and other linear features

Original land survey features (bearing trees, rock monuments, line trees, Spanish land grant corners (crosses in stone)

Mines and associated features including structural (remains) [especially La Luz mine and cabin], isolated small smelting sites, historic lime kilns and quarries

Caves including: Ellis, Sandia, Embudo, Manzano

Sawmill sites

Conditions of known sites on the National Forest vary from undisturbed and pristine to highly disturbed/impacted and in danger of serious, permanent damage and/or loss of the resource. Two examples representing differences in condition: a) a mid-sized Pueblo IV mound in the Sandia foothills represents the former and at least one rock art site along Forest Road 55 in the Manzanos, the latter. As a class or type, Rock Art sites may be among the most vulnerable to damage, especially those located along roads or trails or near residential or developed recreation areas. They are often underappreciated and thoughtlessly vandalized or by (human) nature seem to attract vandalism, and as has been witnessed in the Western USA, receive significant damage from attempts to remove rock art icons and panels for sale on the "black market". Similarly, the lure presented by potential profit from illegal sale of artifacts continues to attract pothunters, thus creating an ongoing threat to all pueblo sites. Other concerns arise over the popularity and illegal use (digging/site disturbance) of metal detectors.

TCAS has been a partner with the FS for surveillance and protection of Pueblo Colorado, Pueblo Blanco and Pueblo de la Mesa through the NM Site Watch Program since the late 1990s. We value those partnerships. Looking to the future, TCAS is ready to take on a greater role. We expect to continue as

Site Stewards. TCAS has knowledge of the location of other sites that might be considered for monitoring.

Finally, TCAS would like to be considered as a resource for helping in the area of archaeological site protection, survey and recording on the Cibola Forest. To do this, closer relations, greater trust and investment in training of willing TCAS (and Site Watch) personnel will be required. Higher levels of involvement by TCAS and Cibola Forest could be beneficial for protection of valued resources and efficacy of both organizations in that pursuit.

Comment:

Your letter regarding the above named project was received in the New Mexico Environment Department (NMED) and was sent to various Bureaus for review and comment. Comments were provided by the Surface Water Quality Bureau, and are as follows.

Surface Water Quality Bureau

The Cibola National Forest is beginning the process of revising the Land and Resource Management Plan (often referred to as the Forest Plan) for its mountain districts (i.e., all districts except for the National Grassland districts). The Surface Water Quality Bureau (SWQB) would like to provide some early to this process. The current Forest Plan dates from 1985. Many developments in natural resources law, policy, and science have occurred since then. For example, Section 319 of the Clean Water Act, which pertains to nonpoint source pollution control, was not part of the Clean Water Act until 1987.

Addressing Water Quality Problems

SWQB encourages the Forest to become familiar with New Mexico's Nonpoint Source Management Program Plan¹, and to assist the State in its implementation. The Plan outlines six objectives. One of the main objectives is to work towards achieving water quality standards in specific priority waters (streams, mostly). These are the streams which the State has found do not meet water quality standards², and which also have total maximum daily loads developed to better describe the impairments. Mainly due to the arid nature of the Cibola National Forest, very few of these streams are present on Cibola National Forest lands. Bluewater Creek is currently the only stream that flows on Cibola National

1 The plan is available at www.nmenv.state.nm.us/swqb/wps/Plan.

2 The main reference for water quality standards attainment is the State of New Mexico Clean Water Act §303(d)/§305(b)

Integrated List & Report, available at www.nmenv.state.nm.us/swqb/303d-305b.

Forest lands that falls into this category. Bluewater Creek above Bluewater Reservoir is listed as impaired by nutrients and temperature, and has TMDLs in place for these parameters³. The TMDL documents include estimates of pollutant load reductions necessary for the stream to meet water quality standards. In the case of temperature, the TMDL document also provides modeled canopy cover

(75.5% percent total shade) that may be necessary for the stream to never exceed its former temperature standard of 20 °C. The temperature standard⁴ for Bluewater Creek has since been changed. The maximum temperature is 24 °C, and temperature should not exceed 20 °C for more than six consecutive hours in a 24 hour period on more than three consecutive days.

The Environment Department has assessed (or intends to assess) water quality in relatively few waters on the Forest. Those that flow within the mountain districts (all are streams) are listed in the table below.

Table 1: State of New Mexico assessed waters within the Cibola National Forest mountain districts.

Assessment Unit Name	Assessment Unit ID	Length on Cibola NF (mi)	Water Quality Standards
Bluewater Creek (Bluewater Rsvr to headwaters)	NM-2107.A_01	19.9	20.6.4.109
Cebolla Creek (Rio Pescado to headwaters)	NM-9000.A_031	4.5	20.6.4.98
Las Huertas Ck (perennial prt Santa Ana Pueblo)	NM-2108.5_00	6.7	20.6.4.111
Rio Nutria (Tampico Draw to headwaters)	NM-9000.A_033	11.8	20.6.4.451
Rio Nutria (Zuni Pueblo bnd to Tampico Draw)	NM-9000.A_029	0.3	20.6.4.451
San Pedro Creek (San Felipe bnd to headwaters)	NM-9000.A_004	3.8	20.6.4.125
Seboyeta Creek (Rio Moquino to headwaters)	NM-2107.A_20	0.7	20.6.4.109
Tampico Draw (Rio Nutria to headwaters)	NM-9000.A_080	4.8	20.6.4.451
Tijeras Arroyo (Four Hills Bridge to headwaters)	NM-9000.A_001	7.6	20.6.4.99

As mentioned above, Bluewater Creek is listed as impaired and has TMDLs in place to describe the impairments. Cebolla Creek has not been assessed, but SWQB intends to assess it against water quality standards for the 2014-2016 State of New Mexico Clean Water Act §303(d)/§305(b) Integrated List & Report. SWQB examined the hydrology of Cebolla Creek on two dates⁵, with the result that the stream may be intermittent or ephemeral, and has not decided which water quality standard will be applied. Las Huertas Creek is listed as impaired by turbidity and nutrients, but TMDLs have not been developed for these parameters. Las Huertas Creek was listed in the past as impaired by sedimentation, but has been delisted based on the results of a pebble count indicating only eight percent fines present. The Rio Nutria (Tampico Draw to headwaters) has not been assessed, due to dry conditions during 2004 water quality survey. San Pedro Creek has an impaired macroinvertebrate community, but a cause (i.e., an explanatory water quality parameter) hasn't been identified. Tijeras Arroyo (Four Hills Bridge to headwaters) is listed as impaired by nutrients, and has an impaired macroinvertebrate community, for which nutrient enrichment may not be the sole cause of impairment. The Rio Nutria (Zuni Pueblo boundary to Tampico Draw), Tampico Draw, and Seboyeta Creek meet their designated uses for which they have been assessed. SWQB conducted a water quality survey in the Zuni watershed in 2011, and several streams in that watershed will be assessed based on the data collected in 2011, for the 2014-2016 State of New Mexico Clean Water Act §303(d)/§305(b) Integrated List & Report.

3 The TMDL documents for Bluewater Creek and other streams are available at www.nmenv.state.nm.us/swqb/TMDL/List.

4 New Mexico water quality standards are available at www.nmenv.state.nm.us/swqb/Standards.

5 The Hydrology Protocol that was applied on one date is described at www.nmenv.state.nm.us/swqb/Hydrology.

Water Quality Protection

New Mexico Water Quality Standards apply to all surface waters of the state, as defined in the standards. As such, the Cibola National Forest is responsible for management of lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, reservoirs or natural ponds on Forest lands. Seeps, springs, and riparian ecosystems are generally either directly included in waters of the state or influence waters of the state. Another main objective of the Nonpoint Source Management Program is protecting water quality, and Cibola National Forest management is key for accomplishing that objective for waters of the state both on the National Forest and downstream of National Forest lands.

Watershed Based Planning

Another objective of the Nonpoint Source Management Program is Watershed Based Planning. For water quality improvement activities, SWQB recommends use of a planning framework described in the Nonpoint Source Program and Grants Guidelines for States and Territories (NPS Guidelines), in the October 23, 2003 Federal Register.

SWQB recognizes the value of the Watershed Condition Framework (WCF) to assist the Cibola National Forest in prioritizing watershed restoration and management activities, and encourages the Forest to incorporate WCF into the new Land and Resource Management Plan. As currently implemented, a key document utilized in the WCF is the Watershed Restoration Action Plan (WRAP). Cibola National Forest has completed a WRAP for a portion of the Bluewater Creek watershed. The WRAP provides much of the information called for in the watershed-based planning framework of the NPS Guidelines. The WCF framework serves the Forest Service appropriately because it addresses a number of resource concerns, and utilizes a broad range of indicators of watershed condition. That sixty-percent of the indicators used in the watershed condition classification are related to aquatic resources means that the two planning frameworks are nearly equivalent. One area in which the Bluewater Creek WRAP could be improved is in setting more quantitative goals related to temperature and nutrients in Bluewater Creek. The two planning frameworks would be exactly equivalent if the WRAP estimated pollutant load reductions that can be achieved with Specific Project Activities.

Interagency Cooperation

Another objective of the Nonpoint Source Management Program is increased interagency cooperation to achieve water quality goals. The New Mexico Environment Department is not able to characterize water quality or other aspects of aquatic environments and watersheds in as much detail or as

accurately as many of our cooperators. There are many opportunities for the Cibola National Forest to participate in the state water quality program, starting with the basic step of providing NMED or the Water Quality Control Commission (WQCC) with supporting information to help WQCC set realistic and attainable water quality standards. SWQB conducts a major review of water quality standards on a recurring basis, with significant changes adopted by WQCC approximately once every five years.

Another opportunity to participate is in providing data to be assessed against existing standards. Each edition of the State of New Mexico Clean Water Act §303(d)/§305(b) Integrated List & Report begins with a call for data, and a call for data is planned in spring 2013, for the 2014-2016 document.

The current Memorandum of Understanding between the New Mexico Environment Department (NMED) and Region 3 of the United States Forest Service (USDA MOU No. 12-MU-11031600-070, "New Mexico Water Quality Protection Agreement") specifically encourages the Forest Service and NMED to "share data, data analysis, and watershed assessment results to improve future planning and management activities on NFS lands", and "use such water quality information for validating existing water quality criteria and designated uses and, when appropriate, develop the data into proposed standards revisions for consideration by the Commission during regularly scheduled water quality standards reviews".

NMED is required to upload water quality data which NMED collects to STORET, where they are publically available. Cibola National Forest staff should feel free to ask for assistance if they encounter challenges locating specific data. A resource which may be useful for identifying and SWQB information resource is the SWQB Mapper, an on-line GIS tool at <http://gis.nmenv.state.nm.us/SWQB>. The SWQB Mapper can be useful for identifying sampling stations and answering questions about specific streams such as impairment status and availability of TMDLs. Shape files for any of the GIS data viewable on the mapper are also available upon request.

Comment:

HCAE has been volunteering time on the Mt Taylor Ranger district over the last 4 years from doing trash pickup and helping install Kiosk on Mt Taylor. This has been done in partnership with New Mexico Off Highway Vehicle Alliance "NMOHVA" and Mt Taylor Ranger District.

I would like to address 2 items in your letter announcing land and resource management plan under the 2012 Forest service Planning Rule ;

Item 8: Multiple uses and their contribution to the local, regional and national economies

Item 9: Recreational settings, opportunities and access, and scenic character

When you can intertwine Item 8 and Item 9 then you can create an atmosphere that can help interject outside money into the local economies through Motorized Recreation. When you create environment which promotes rural economies to motorized recreation then you can draw parallels between Moab and Paiute Trail in Utah. Moab having a similar back ground as Grants uranium mining and mining in the rural areas around the Paiute trail. These areas have benefited from this substantially from the influx of

outside money to which their local economies directly benefit from motorized recreation. Also, the weather and environment are also similar to which you can maximize recreation quite a bit of the year

What I would not like to see:

Within the Land and Resources Management Plan for the Kiowa, Rita Blanca, Black Kettle and McCellan Creek :

Desired Conditions

The designated road and trail system accommodates various classes of motor vehicles. The system provides a safe experience that minimizes impacts to soil, water, vegetation, wildlife, scenic, and heritage resources.

Opportunities for OHV use occur where the motor vehicle use map (MVUM) shows designated roads, trails, and areas. The designated system reduces the impact of roads and trails to resource values by prohibiting unauthorized road and trail development and correcting or mitigating poorly located system roads and trails. Motor vehicle use is especially limited in areas that provide outstanding nonmotorized recreation opportunities, such as in Mills Canyon and the Santa Fe National Historic Trail corridor. Where OHV opportunities are provided, routes occur in areas where natural resource impacts can be minimized. Conflicts with other uses are minimized. A range of experiences and challenge levels appropriate for the level of recreation opportunity spectrum exists, particularly in areas designated as roaded natural, rural, and semiprimitive motorized.

Objectives

Within 15 years of plan approval:

Rehabilitate all unauthorized routes and decommissioned roads, where resource damage is occurring and as funds are available.

Close or reconstruct all routes that are identified as having health and safety issues.

I would not like to see the same thing happen within the Cibola National Forest which you did on the National Grass Lands. The Cibola NFS has no issuance of being able to work with local communities and land owners to Motorized recreation which can/could benefit local communities in the Objectives. The Objectives rehabilitates, decommissions, close or reconstructs all routes. The Cibola truly shows what you want to do and this to promote non-motorized recreation in the above Bold section above in the desired condition. If Cibola NFS didn't want this then why would you mention non-motorized opportunities in the motorized section?

What I would like to see:

True multiuse and not limiting one to benefit another

Tourism is one of greatest money makers for business in New Mexico that hasn't be exploited in the rural communities. Make it an OBJECTIVE to work with rural communities to use the NFS to bring monies to the rural economies. Enhance their ability to use OHV tourism as one of the many items it takes to support a local economy.

Promote OHV tourism access to bring others to camp and stay in local areas around and in the National forest.

Do something to help the rural communities and not reason for them to hate the bureaucratic nightmare of the United States Forest Service.

Comment:

I work for the Cottonwood Gulch Foundation, a non-profit that focuses on environmental and experiential education. We regularly use the Cibola NF lands for our programs, and our Base Camp borders the Cibola NF in the Zuni Mountains south of Thoreau.

We are happy to participate in the creation of a new Forest Plan. Our main concerns are the preservation of the National Forest as an ecologically healthy place. We camp, hike, backpack, and run educational programs on National Forest land every year, and while we wholeheartedly support a "land of many uses," we also know it is important to acknowledge that the days of clearcutting forests and overgrazing our grasslands need to be behind us. We support policies that preserve the health of the forest ecosystem that include sustainable practices of recreation, logging, grazing, hunting, etc. We also support active restoration in areas that have been previously damaged by humans, as well as a strong effort to prevent catastrophic forest fires, especially near our Base Camp.

Comment:

I have been actively pursuing archaeological and historical research in New Mexico since 1971. The skein of human existence in New Mexico captured my passion years ago and I believe that preserving our shared history in all its many manifestations (archaeology, archives, oral accounts) is important. I also know that this view is not universal and that many feel that archaeological data in particular, while interesting, are not key to our future development and should be relegated to a lesser status when considering management of our public lands.

What is not universally understood is that archaeological data is also environmental data and that archaeology provides us with the longest available record of human interaction with a changing environment. This is because the archaeological data provides a temporal context for environmental conditions reflected in the charred plants, animal bone, soil deposition, carbon isotopes, and pollen that can be bracketed in time by the presence of artifacts and living surfaces altered by human occupation.

For the last 15 years I have been pursuing a research project on private land located on the fringes of the Cibola National Forest in Socorro County. The Canada Alamosa Project has focused on the

excavation, testing and recording of an array of archaeological sites that, taken together, reflect a 4000 year sequence of human activity in the region. Our project is multi-disciplinary and has incorporated individuals trained in botany, palynology, zoology, and soil science. Their studies have resulted in significant insights regarding the environmental history of the area, a few examples which are presented here:

1) The macrobotanical samples recovered from the fire pits and ash lenses of the prehistoric archaeological sites have yielded a robust 700 year (A.D. 700-1400) sequence reflecting the changes in the local plant community during that period. The data indicate that use of local wood shifted from a broad based use of both riparian and upland species (including ponderosa and pinon) to almost exclusive use of juniper and mesquite by the end of the sequence. Some non-woody riparian species such as fragmites are present in the archaeological remains but are not present in the canyon today, suggesting that the riparian environment was much more stable prehistorically. Mesquite is present throughout that sequence and was clearly growing at elevations of at least 6000 feet prior to A.D. 1000 and long before the introduction of cattle. As each firepit can be dated to within a 100 year period, the macrobotanical data provides a fine-grained view of changes in the prehistoric environment.

2) Pollen samples taken by soil scientists from both higher and lower terraces of the Alamosa clearly indicate that both riparian and upland terraces were supporting corn agriculture. The presence of corn and squash pollen in lower terraces now truncated by flooding point to a time when the riparian zone was much more stable and also suggests the possibility that denuding the riparian area for farming may have begun the erosional pattern that we see today.

3) Faunal material has yielded large numbers of the expected species (e.g. deer and rabbits) but has also held some surprises. Remains from the largest of the sites supports the growing body of data that the Plains of San Agustin supported herds of bison until at least the 13th century. More surprisingly, the remains of peccary, thought to have been a recent intrusion into the area, have been identified from excellent 14th century context on the Pinnacle Ruin.

4) Soil scientists have long been intrigued with the cutting and filling episodes revealed in the arroyo banks of the American Southwest. When they can be accurately dated, they reveal much about past climates. More recently the study of carbon isotopes (isotopes left in the soil after a plant has decomposed) has allowed even greater interpretation of climate change. Archaeology becomes important because human occupation of a land surface almost inevitably leaves temporally diagnostic artifacts and charcoal that can be radiocarbon dated, providing the soil scientist a temporal context for changes in both soil deposition (erosion vs. stability) and the nature of the carbon isotopes (shifts in the dominance of C3 (shrubs and woods) versus C4 (grasses) plants over time). Dr. Monger's work has provided data for the reconstruction of a 4000 year sequence of regional climate change as the carbon isotopes reflect shifting patterns of C4 and C3 plants over time. Without the presence of archaeological materials, dating these patterns would be much more difficult.

5) A final note is that serendipity (the finding of things not searched for) often plays an important role in research. Our initial goal for the Canada Alamosa Project was to gather data to reflect a 2000 year

sequence of human occupation and a changing environment within the Rio Alamosa watershed. In our last year of excavation, we worked on the Montoya Site which contains a 12th century pueblo occupation. The west side of the site is covered with an alluvial slope emanating from the canyon wall. Some pueblo rooms were set into that slope and we wondered how many more might be buried in the alluvium. Excavation of several test units revealed an organic, artifact laden fill in the upper 30-40 centimeters. Below that a hard, compact non-organic soil continued for another meter until the surface of the ancestral stream terrace was reached. At that interface several small fragments of corn cobs were found. Radiocarbon dating provided dates of 3925 and 3973 BP (before present) for these small and very grass-like cobs. These dates verify that these samples are some the very oldest corn found in the American Southwest. Most of the other early corn has been found in rock shelters. How much more might be buried in the deepest levels of open archaeological sites?

My point in this letter is to inform land managers of the various ways that archaeological sites can contribute to our understanding of the environments that they are responsible for managing. It's not just about pottery and arrowheads.

Comment:

We wish to comment on topic 9. (recreation settings, opportunities and access, and scenic character) as it relates to the Continental Divide National Scenic Trail.

The CDNST needs to be recognized as a Congressionally designated area and, as provided in the Forest Service Manual (2353.44b), the land management plan must establish a management area for the Trail – one that is broad enough to protect natural, scenic, historic, and cultural features.

The plan should establish (within the Mt. Taylor Ranger District) the trail class, managed uses, designed use, and design parameters for the segments of the CDNST that traverse the District and identify uses that are prohibited on those segments. The plan should prohibit motor vehicle use along the Trail, with the limited exceptions set out in FSM 2353.44b para. 11. The plan should consider whether any segment that may be located on a road is one that “is primitive and offers recreational opportunities comparable to those provided by a trail with a Designed Use of Pack and Saddle Stock;” unless the Forest is unable to locate the Trail elsewhere, it should not be located on a road. (Comprehensive Plan IV.B.1.b.)

In all cases, the plan should recognize that “the nature and purposes of the CDNST are to provide for high-quality scenic, primitive hiking and horseback riding opportunities and to conserve natural, historic, and cultural resources along the CDNST corridor” (Comprehensive Plan II.A.). In particular, the plan should reflect the provision of FSM 2353.44b para. 10 that bicycle use may be allowed only if the use will not substantially interfere with the stated nature and purposes (although detailed evaluation might be deferred to subsequent site-specific assessments).

Scenic quality is a prime consideration for achieving the goals and objectives of the CDNST. The Trail is a concern level 1 travel route, and the scenic integrity objective is to be high or very high depending on the segment. Comprehensive Plan IV.B.4c. Even beyond the CDNST management area, certain types of

activities (e.g. large energy developments) should be excluded if they would substantially interfere with the nature and purposes of the Trail.

The plan should provide for the consideration of relocations of the CDNST that would improve the setting, in particular by avoiding the necessity to walk or ride along, or in proximity to, roads. The most important potential relocation, in this regard, is the section within Forest boundaries, between Grants and lower Bonita Canyon (over San Rafael Mesa). In addition, it may be practical to move the CDNST off roads between Antelope Flats and Ojo de los Indios; if not, the road should be managed to be “primitive and [with] recreational opportunities comparable to those provided by a trail with a Designed Use of Pack and Saddle Stock”

The plan should provide for the development and protection of water sources for hikers and pack and saddle stock use – at least where the interval between natural water sources is “excessive,” though it would be desirable to do so more frequently (e.g. if the interval is greater than 10 or 15 miles) where practicable. (See FSM 2353.44b. para. 9.)

I would welcome the opportunity to discuss these comments with you.

Comment:

We are interested in these topics from the list you sent on October 24, 2012

Terrestrial and aquatic ecosystems and watersheds

Air, soil, and water resources and quality

System drivers

T&E species and species of concern

Social, cultural and economic conditions

Benefits people obtain from the Cibola planning area

Multiple uses and their contributions

Renewable and non-renewable energy

Infrastructure

Existing and future designated areas

Comment:

Specific areas of interest to me relate to the rights and interest of existing Special Use Permit holders and the consideration of energy corridors as well as access to them.

Comment:

I am particularly concerned about hiker access in the Sandia Ranger District. I want to address two issues: wilderness group size limits and blockage by private land owners of access to trailheads on public land.

I belong to the New Mexico Mountain Club, a group with 820 individual members. It was founded in the early 1950's and is based in Albuquerque, though it has members throughout the state. All NMMC activities are open to the public. For the last sixty years, the NMMC has successfully introduced novice hikers to the beauties that surround us.

NMMC sponsors Saturday and Sunday hikes within a 120-mile radius of Albuquerque, so destinations can include all four of the Cibola Ranger Districts, the Santa Fe and Carson Nat'l Forests and other public lands. NMMC has a technical rock climbing section that makes use of crags in the Sandias and elsewhere. There are also week-end and week-long car camping and back packing outings, in-state and occasionally in Colorado, Utah and Arizona.

However, the most concentrated area of use by NMMC is in the Sandia Ranger District. The NMMC has three standing hikes every week in the Sandias. There is a Sunday afternoon hike of 3 to 5 miles, usually on the west side in winter and east side in summer, attended by 2 to 12 people. There is a Tuesday evening hike which always has a fixed destination: the La Luz trail from April to October, and the Elena Gallegos Open Space from November to March. The Tuesday hikes have been going on for at least 25 years to my knowledge. Current attendance is 2 to 8 people, but in earlier years, groups of 20 or more weren't unusual. There is also a very popular Wednesday morning hike which has been going on for 20 years or more. The Wednesday hikers are mostly retirees who are free on week days. Until this last year, the Wednesday group has been attracting 18 to 25 people for winter foothills hikes and Crest snowshoe trips, and summer hikes on the Crest and east side of the mountain. The recent enforcement of group-size limits in the Sandia Wilderness has had a big impact, particularly on the Wednesday hiking group.

There are many other groups, formal and informal making regular use of the Sandia Wilderness trails. Ones that I am personally acquainted with include the Happy Hoofers, the Wayward Women, the Tuesday Trekkers and the Albuquerque Senior Center hiking groups. The Albuquerque Mountain Rescue Team holds training sessions in the Sandia Wilderness.

I understand that a federal court decision has mandated group-size limits in the Shur Bien Trust Area, which includes the Fletcher Trail, the Movie Trail, the Rincon Trail and the southern end of the Piedra Lisa Trail. I appreciate that a transition zone has been drawn to allow a larger group-size on the La Luz Trail. I recognize that some sort of group-size limit might be desirable for a wilderness close to an urban area to prevent overuse.

However, the 10-person limit seems unnecessarily restrictive for the of the Sandia Wilderness outside of the Shur Bien Trust, given the history of decades of responsible use by local groups. The Transition Zone chops up important trails at unmarked points, which is confusing to hike planners. Serious hikers usually think of a trail as a whole. Important trails that cross from transition zone to semi-primitive zone include Pino, Embudito, White Wash, Emudo, Three Gun, both ends of the Crest Trail, Barts,

Canyoncito, La Cienega, Osha, and even the Faulty Trail. In terms of how people actually use the wilderness, it makes more sense to apply the group size limit to the trail as a whole. I don't like subdividing the wilderness into zones, but if it has to be done, place the zone boundary at significant trail junctions like Oso Pass which make sense for route planning.

I feel that 20 is a reasonable group size for the entire Sandia Wilderness. If that can't be done across the board, consider issuing year-long exemption permits for groups like NMMC that have a record of responsible leadership. If overuse becomes a problem, consider a lower group-size limit for weekends when use is heaviest. In my experience as a Wednesday hiker, it's infrequent to meet anyone beyond the first mile up a wilderness trail on a weekday, especially in winter.

My second concern about the Sandia Ranger district is access to the Cole Springs picnic ground and the trailheads for Bart's and Canyoncito Trails. When I moved here in 1985, we could drive to Cole Springs. At some point, private vehicles were excluded from the road and we had to walk the extra mile or so to get to those destinations. In the last couple of years, private landowners have excluded even foot traffic on the access road. I think the Forest Service, in conjunction with other relevant jurisdictions (the county?), should assert the public's right away along historic travel routes. Re-establishing access to this portion of the Ranger District will have the positive effect of dispersing use that is now being concentrated at La Cienega and Doc Long's. Ideally, re-establishing access would include repairing the section of road that is on public land. It has become badly eroded.

One more small point: there is a need for coordination between the Sandia Ranger District and the adjacent Albuquerque Open Space about place names. Case in point: the Piedra Lisa is a popular, long-established trail at the north end of the Sandia Wilderness, easily accessed from Albuquerque. Quixotically, the Albuquerque Open Space recently applied the name Piedra Lisa to an area in the Sandia foothills at the east end of Manual Blvd. Now, when you ask Google Maps for directions to the Piedra Lisa, it takes you to the end of Manual, which is actually White Wash Trailhead. I've personally met one very confused hiker and I'm sure there have been more. I know the Forest Service didn't create this mix-up, but maybe they could establish a liaison with ABQ Open Space to solve it.

Comment:

My interest is in recreation opportunities in the units of the CNF. I hope the new plan preserves the scenic and wilderness character of the areas of the CNF that have yet to be developed. There are areas that have not been designated as wilderness, yet possess many of the same characteristics as designated wilderness areas. One such area is in the San Mateo Mountains adjacent to the Withington Wilderness. I found that area to have many of the characteristics of wilderness.

Having large tracts of wilderness in relatively close proximity to our state's major population center is important now and will be more so as the population grows.

Comment:

While I won't make it to the proposed public meetings regarding your ambitious forest plan update, I applaud your efforts.

I also am glad to see that you will be drawing from many of the existing data sources to help guide your plan development, including the 2010 NM Statewide Forest Resource Assessment.

I wanted to let you know (although it is very likely you already are aware of them) about an independent non-partisan research organization that has developed tools to assist the Forest Service and Bureau of Land Management, Headwaters Economics (<http://headwaterseconomics.org/>). They have an excellent free online socioeconomic tool that generates many relevant preset and custom reports based on US Census Bureau data. They also have other analysis and tools in the areas of wildfire and energy.

I highly recommend visiting their site and seeing how their efforts might dovetail with your Forest Plan revision.

Comment:

We would like to see the Red Canyon area thinned out. The forest is overgrown and needs to have fuel reduced to prevent another fire. The Fourth of July Canyon also needs to be thinned. I would also like to see after a fire, that we would fast track to cut large timbers that are destroyed in a fire. After the 3 fires in the Monzano Mtns., all the big trees went to waste. They could have been used as firewood, lumber or some other use. It was a shame to watch 60-70 ft. pine and spruce rot out and have no use. Shame.