

Received during written comment period, by respondent:

Name	E-mail address	Affiliation	Entered at
Section/Para	Comments		
Ernie Atencio	ernie@taoslandtrust.org	Taos Land Trust	10/08/2004 at 01:56 PM
A	General comment: Excellent and comprehensive, particularly attention to economic component. Great opportunity to provide and support sustainable rural livelihoods and use jobs and/or other market incentives to involve local communities in sustainable forest stewardship within a traditional cultural context. Strongly support! Suggested reference: La Vida Floresta: Ecology, Justice, and Community-Based Forestry in Northern New Mexico, by myself. 2004: Northern New Mexico Group of the Sierra Club.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:27 PM
A	Dear Planning Committee, Thank you for the opportunity to comment on this unprecedented effort by the State of New Mexico and Governor Richardson to develop a statewide plan to address forest and watershed health. If drafted and implemented appropriately, the plan has great promise to remedy, on a large scale, the serious damage and imbalances resulting from centuries of mismanagement. Forest Guardians seeks to preserve and restore native wildlands and wildlife in the American Southwest through fundamental reform of public policy and practices. We are encouraged by the efforts of the Planning Committee and hope that our critique can be used constructively to refine and improve the New Mexico Forest and Watershed Health Plan. Overall, the draft plan is a comprehensive visionary document. It is necessarily vague, but does address the role the state can take in facilitating forest and watershed restoration. We have some concerns that we would like to elaborate upon.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:28 PM
G02	On the whole, the vision statement is well written and compelling. The statement seems to include a full working knowledge of ecological, socio-cultural, and economic principles. We are pleased that the planning committee has acknowledged that disturbance regimes operate within a general, natural range of variation and that the range of variation should be accommodated. However, we want to emphasize and hope that the planning committee will recognize, that natural range of variation is a statistical phenomenon and one that is often based on tenuous data, at best. There will always be outliers in the data and accepting these extremes may be necessary at times. For instance, in many of New Mexico's drier forest ecosystems the range of variation for fire return intervals is in the range of 5-30 years. What must be understood is that there will be exceptions and cases on the far ends of the range. This same concern applies to fire severity and extent. We may see large-scale, severe fires from time to time, but these are part of the natural range of variation.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:29 PM
	Collaboration is a palatable word that is used profusely in the area of restoration and resource management, but		

K01	<p>often rings hollow. Our experience, though not always, is that agencies will mail a notice or make a phone call, perhaps a stakeholder will be present at one or two initial meetings. However, input from the stakeholder(s) is often ignored and instead the agency uses the stakeholder's limited association as "proof" that a collaborative process has been achieved. This is not collaboration. Although this popular term may make us feel good or serve as cover, a true commitment to collaboration means being inclusive and making a concerted effort to adapt a project or plan to include all stakeholder interests to the greatest degree possible. We also want to note that on federal and state lands collaborators may not always be local. Local collaborators have an equal "stake" in the condition of these lands, but so do state residents 200 miles away. When using the term local, the planning committee should be cognizant that it may have different implications depending on the land ownership.</p>
Bryan Bird	<p>bbird@fguardians.org Forest Guardians 10/26/2004 at 04:30 PM</p>
K04	<p>Long-term maintenance is critical to sustainable forests and watersheds in New Mexico. Much of the time this may be as simple as allowing fire to fulfill its natural role through either a "let burn" policy or a prescribed burn program. In some cases however, there may need to be multiple mechanical treatments over the long term, such as treating tamarisk in the state's bosques. Regardless, maintenance must be accounted for up front, both the specific ecological requirements as well as the economic requirements of long-term maintenance. Maintenance of ecosystems and their essential processes cannot be considered in a vacuum, the cessation of the causes of ecological degradation must also be accounted for. Often, agencies look to the causes as part of the solution or long-term maintenance plan. For ecological restoration to be successful, the causes of the degradation must first be eliminated or curtailed significantly.</p>
Bryan Bird	<p>bbird@fguardians.org Forest Guardians 10/26/2004 at 04:31 PM</p>
K07	<p>In promoting sustainable utilization businesses and markets, the state must consider, frankly, its role in markets as well as the long-term sustainability of utilization businesses. What role exactly should the state play in subsidizing businesses and new markets? Further, does the state want to be facilitating new markets for products on state and federal lands when none now exists? For example, there is much commotion regarding the opportunities for biomass energy production in New Mexico. However, the data is lacking to inform such enthusiasm. How long will biomass production from state and federal lands last? Will there be an eternal supply of biomass? What environmental impacts are associated with the collection and transportation of biomass? There currently exists no market in the state for biomass, why should there be a new pressure placed on state and federal lands to provide a marketable product? Would the economic benefits of creating this new market outweigh those already in existence? Equally important is that the state addresses the original causes of environmental degradation and determines that these causations are not going to be considered the solutions for utilization businesses and markets.</p>
Bryan Bird	<p>bbird@fguardians.org Forest Guardians 10/26/2004 at 04:32 PM</p>
	<p>Forest Guardians agrees unconditionally with this critical piece of the draft plan. We are pleased that the planning committee understands the importance of monitoring. Of course monitoring will only materialize with</p>

K20	funding. Also, the information gained from monitoring is only as good as the monitoring protocol itself. The right questions must be asked and the appropriate variable measured. For instance, in a forest restoration project, if only the overall species richness is monitored rather than population trends for rare species associated with that forest type, nothing is gained. It will be the design of monitoring strategies that makes or breaks this component. In addition, the monitoring data must be available and incorporated into the design of future projects and plans; otherwise known as adaptive management. There must be a strong feedback mechanism in place to fulfill the adaptive management mandate. Too often an agency collects monitoring data from a project and then never uses that data to inform future projects, thus it is acting without using this valuable information to adapt its management plans and projects. Further, agencies often monitor the wrong variables or rely to a disproportional degree on observation rather than measurement.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:32 PM
L17	Policies, procedures, and legal requirements are not the problem, misguided projects are. We are pleased that the planning committee chose the term mitigate here, as it should be acknowledged up front, as the Western Governors Association has already done, that no laws or regulations will be changed for this plan's implementation. If projects were well designed, avoided the causes of the original degradation, considered long-term maintenance, and included a genuine monitoring and adaptive management component, there would be far lesser likelihood of administrative or legal challenges. The laws enacted to protect human health and the environment are critical as a check and balances system and ensuring that the citizens of New Mexico continue to enjoy a clean, healthy environment. It is not the policies, procedure and legal requirements that need to be addressed but rather the policies, plans, and projects themselves.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:33 PM
L24	It will require more than just increased stakeholder knowledge to reduce conflict and attain more rapid results. More important than the dissemination of knowledge is a genuine effort to listen to stakeholders and accommodate their concerns and desires to the greatest degree possible.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:33 PM
M03	We are very encouraged by the creation of these state leadership entities and believe that much trust will be gained in their conception. It will be critical that the state office and representative oversight group work closely together and be given appropriate authorities. Forest Guardians hopes the planning committee will give the Governor the authority to appoint the oversight group.		
Bryan Bird	bbird@fguardians.org	Forest Guardians	10/26/2004 at 04:35 PM
	Overall, Forest Guardians is pleased with this draft plan and hope that its implementation will result ultimately in restored landscapes and reintroduction of native ecological processes as well as viable populations of native wildlife and plants. Forest Guardians was involved recently in drafting and endorsing a set of restoration principles: The Citizens' Call for Ecological Forest Restoration (file). The document is proposed as a national policy framework to guide sound ecological restoration policy and projects and was conceived by a diverse		

N	group of forest activists and forest ecologists from around the United States with input from representatives of forest practitioners and community-based forestry groups. We attach that document here for reference by the planning committee during the finalization of the New Mexico Forest and Watershed Health Plan as well as use in developing more detailed guidance, project and plans. Please share it with the entire committee if possible. . Sincerely, Bryan Bird Forest Guardians Forest Program Coordinator 505-988-9126 x157		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 11:11 AM
B01	This is not a plan. It does not follow the format and 7-step planning process. This is a white paper.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 11:17 AM
B02	The U. S. Bureau of Reclamation, the premier water resource management agency in the west, is conspicuously absent from membership on all plan and planning committee groups.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 11:32 AM
B03	"The Committee's commitment is to the central goal of returning our environment to healthy functioning and resiliency of natural processes..."...later in the document "Promoting ecological integrity, natural processes, and long-term resiliency is the primary goal...". A Plan requires a single, clear and comprehensive goal statement. I believe the "of" before "natural" in the first quote above should be "to".		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 11:35 AM
B04	A collection of a vision, guiding principles, and recommendations is not a plan.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:10 PM
D02	Nearly 100 years of deferred surface water adjudications is also part and parcel to the need. Why should anyone invest in this vision when the primary potential benefit (more water) remains effectively unmanaged? For those who would claim this issue is outside the scope of this document, I suggest that the scope is not comprehensive. A true plan would manage the fruits of successful implementation. This includes incorporation of the politically distasteful concept of growth management.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 12:56 PM
D03	Not all efforts underway are collaborative or share the document's espoused goals. How are activities that are at odds with the stated intent to be dealt with?		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 12:53 PM

D04	Coordination and support are useful activities, but they do not constitute leadership, or a leadership role. Someone with authority, interest and clear objectives is required at the State level. I do not see that person identified in this document.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:58 PM
D06	Suggest replacing "learning" with education.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:31 PM
E17	Sustainable has many topic specific definitions, but this definition falls short in this context. Replace "use" with consumption, insert renewable before "natural", replace "productivity" with availability, and replace "resilience" with quality.		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:55 PM
F01	"...unsustainable use in the past, and..." seems to imply that current use is sustainable - it isn't. Suggest rewording as "...past and present unsustainable use and...".		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:49 PM
F02	"New Mexicans are a land-based people..." is less than descriptive. Are Coloradoans atmospheric-based people? (I thought Rosewellians were space-based)		
Steven Bowser	sbowser@uc.usbr.gov	U. S. Bureau of Reclamation	10/15/2004 at 01:23 PM
N04	This effort serves as a good scoping for the Plan that needs to be developed. Many recommendations are for information and data that would constitute the data gathering step in a true comprehensive planning process. Hire a professional planner to follow-on with a real plan, and stop referring to this document as a plan - it isn't. (A planner isn't someone with the title - a planner has an advanced degree in planning, understands and can apply the process)		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 08:01 PM
D03	An accounting of these "millions" needs to be tallied. How many of these millions went for administration vs. on the ground. State/Federal agencies administration costs are very high, spending precious dollars on plans, paperwork, vehicles and radios, salaries and new buildings. Grassroots organizations have lower admin costs, getting more dollars on the ground. These local groups (not the SWCD's who have poor resource management history) should be better supported an increased funding.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 08:53 PM
	The problems identified with watersheds are caused by a multitude of reasons, however, the word grazing		

D04	continues to be repeated and repeated. The environmentalist drive to end grazing should not be confused with watershed restoration efforts. Identification of the exact problem is the key to successful watershed management/restoration/activities or funding. Inventories must be taken to determine the causers, including no-burn policy and wildlife overpopulations, or constuction, to mention a few.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 08:56 PM
D04	Leadership at the state level is fine, but without local participation to determine exact needs, resources and local land use plans/water plans, the states plans may conflict. The local communities, including grassroots MUST have a seat at the watershed management determination table. Local input from quasi-government groups is not adequate.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:02 PM
D05	Again, economies thrive with biologically sound systems. Is this the State of NM determining economics or the local community. The state has a vested interest in the water, natural resources, minerals, fuels, timber and wildlife. These areas create income for the state, yet many communities are second or third. The states inventory of resource development may not merge with county land use plans, goals, or culture.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:10 PM
D07	Economic stability is loosely used here. Who's stability? Who's economic's? Who's definition? Watershed management has many definitions depending on who is using the term. Who is the authority in this document to cause accountability? If Federal funds are used, a completely differentis based on popularity. If SWCD's are used, the program will fail.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:19 PM
D07	The community values will be sustained by ecological restoration? I've seen communities destroyed in the name of restoration and/or rehabilitation. To say that ecological restoration sustains human values doesn't mean that it sustains humans. Planning from a community based system will help identify the "values" and are the values of the community, not the values of, environmentalists, lobbyists, special interest groups or federal agency agendas.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:23 PM
D11	Items 1A,D,E,F,G all fall under what was supposed to happen under the millions spent on the salt cedar project that the State "took the lead", but instead, passed it on. These items did not happen with State leadership. Who is accountable to see that it will happen this time? A task force?		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:27 PM
E06	The terminology here is good, however, the implementation and methodology is is an area where those who have the money and those who have the expereience are not at the same table.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 09:32 PM
	We will continue to react to the "symptoms" until the exact nature of the cause is determined. Removing		

E13	Pinon/juniper is a symptom and removing it causes temporary relief, but the true solution is to determine why the P/J (in that shed or that range or that riparian zone) populated and established. It's not always the same reason.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 09:40 PM
F04	They don't lack info/tools. They lack inventory and monitoring. The reason individual effort caused success is because only a few individuals stepped up to the plate. Now that the masses (the state, organizations and agencies) have realized these individuals were right they will kick them out, then call themselves collaborative. But they will never again be called community based or highly successful.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 09:45 PM
F05	I applaud heartily if this would work this way. Many people knew 35 years ago about the long-term. Now we're even later. The plan must determine the amount of time to spend planning and when to get something done. However, again, who will determine what 'benefits' a community. Will the community decide if it is a benefit or detriment. The community must decide the direction of the shed, not the funding agency.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 09:55 PM
G04	Sustainable tactics and techniques should not be used to determine (only) BMP's. We have a lot to learn about sustainability, and the use of this term with "economics" and "ecology" should be done with the utmost of intelligence and care, and not with idealistic applications from the salt shaker.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 09:58 PM
H05	best available science and local customs/cultures may conflict. If the State decides priority, is there accountability?
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 10:02 PM
H08	Redefine the term Acequia. Used here it implies a ditch, which is correct. The State, however, narrowed the definition to mean only a ditch that three people use, or collectively called a "community" ditch. All ditches are community ditches, as they deliver water through the community, even though there may be only one water right owners. Individual ditches do not qualify for fed/state cost share- only community. Will this plan support that? All ditches are in need of conservation efforts.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 10:13 PM
K	As stated throughout the document "the state will take leadership and is capable". This para. shows where the state will pass on its responsibilities. Many receivers are not qualified (SWCD's), but apparently that is not the State's concern. The success of many of these shed programs will be threatened if handed down and done "just like we've always done in the past". Previous shed activities were a failure and will be abandoned. Previous management strategies should be abandoned, too.
sally canning	laughingsheep@pvtnetworks.net Water Defense Association 10/26/2004 at 10:22 PM
K02	Local grass-roots organizations are proving to be more organized and capable. These groups are getting the work done! I don't really consider the SWCD a stakeholder.

sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 10:18 PM
K02	Wrong. Again, the SWCD's have failed. They have in Lincoln County. As long as the previously unsuccessful management plan stays intact I cannot support this verbiage. I'm afriad we've just colored the same old dead flower. The 47 SWCD's have been charged with this task for the past 25 years. Several have done a fine job, many are just too busy to handle watershed restoration. The County should decide who would handle their state funds		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 10:26 PM
K10	Disagree! There are quite a few private companies who have been doing this for years, are doing cost effective work, follow up, monitoring, reseeding, erosion control and water quality management. The local labor force has been left out because much of the agency work brought in all their own labor. few jobs were created and no local education/training occurred.		
sally canning	laughingsheep@pvtnetworks.net	Water Defense Association	10/26/2004 at 10:35 PM
K19	How can they monitor successfully. It is difficult to analyze data when there is no baseline. Inventory is essential. The key to a successful program is 1. proper identification of the specific problem 2. inventory of resources 3. basic data collection 4. activity and 5.THEN continued monitoring.		
Martin Devere	devere@c2i2.com	Consulting Forester	10/18/2004 at 12:53 PM
C02	Committee lacks anyone that will in the end have to do the work to accomplish the goals. No industry representatives that will take the forest thinnings and turn them into an economic enterprize that will help pay for all that needs to be done.		
Martin Devere	devere@c2i2.com	Consulting Forester	10/18/2004 at 12:58 PM
D15	Need to get individual National Forests to coodiniate efforts to prduce an economic package that will get restoration done.		
Martin Devere	devere@c2i2.com	Consulting Forester	10/18/2004 at 01:14 PM
F04	Must consider the cost of getting things done. Congress will not fund these projects forever. A developement plan must be devised that will pay for itself over time.		
Martin Devere	devere@c2i2.com	Consulting Forester	10/18/2004 at 01:25 PM
K08	Develope thinning projects with a long enough time period so that business can attract the finicial resources necessary to complete the work.		
Martin Devere	devere@c2i2.com	Consulting Forester	10/18/2004 at 01:43 PM
N04	Over all comment. Plan was developed primarily by bureaucrats and academics, at some point business that will actually do the work will have to become involved for this plan to work.		
Tom Fry	tom_fry@twS.org	Wilderness Society	11/04/2004 at 01:42 PM
	Thank you for the opportunity to comment. Please accept for consideration the following comments of The		

A	Wilderness Society (TWS) on the New Mexico Forest and Watershed Health Plan. As one of the nation's largest and oldest non-profit conservation organizations, TWS has long worked to protect the ecological sustainability of public lands as elemental to our collective social and economic well-being.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:42 PM
B	We would like to offer our appreciation to Governor Bill Richardson and the New Mexico State Legislature for calling for this forward-thinking initiative. Involvement of the states as an equal participant in issues of watershed, forest, and fire management is often lacking but crucial to successful landscape restoration.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:43 PM
D05	We would also like to express our appreciation to the Planning Committee for crafting a comprehensive and thoughtful Plan prefaced on commendable vision and guiding principles. As the Plan's vision articulates, ecological and community health are inextricable with socio-cultural and economic sustainability predicated on an ecosystem "characterized by integrity and resiliency."
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:43 PM
E	Definitions do matter. As such, we appreciate the list of key terms offered early in the Plan. We agree that effective collaboration requires a clear understanding of frequently used, but often ambiguous, language. We hope the following will further refine these concepts.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:43 PM
E02	Collaboration. While it may be intuitive that involving stakeholders in a set of decisions means that the input of stakeholders will be incorporated into decisions, it may merit articulating that by involvement, the Planning Committee and the Plan mean that stakeholders will be involved in a two-way flow of communication during the decision-making process itself.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:44 PM
E06	Ecological Restoration. While the definition itself is satisfactory, the examples used to illustrate the definition rely on active restoration practices. Often passive restoration actions- removing the cause(s) of degradation- are the most efficient and effective means to realize restoration goals and objectives.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:44 PM
E14	Stakeholder. Do stakeholders necessarily mean only those populations currently "involved" in ecological restoration? That is, people with an interest, but no active participation, in restoration can and should be considered stakeholders as well.
Tom Fry	tom_fry@tws.org Wilderness Society 11/04/2004 at 01:45 PM
E18	Watershed. While the advantages of defining this term broadly facilitate the ability to conceive of restoration across an ecologically-meaningful landscape, overly broad or inclusive definitions may lead to subsequent difficulties in establishing coherent priorities.

Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:45 PM
F01	In describing the increasing ecosystem health problems across the landscape as rationale for this Plan, symptoms of ecological degradation are addressed. Susceptibility to catastrophic wildfire, compromised watersheds and decreased water supply, accelerated erosion, and desertification are given as examples. While a program of work addressing these symptoms is certainly warranted, equal attention must be given to the underlying causes of these symptoms where they can be ascertained.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:46 PM
F01	Chief among these, in our view, is the exclusion of fire as a natural and necessary process in the ecosystem. Returning the natural variability of fire equally across all ecosystems is obviously not possible. However, effective restoration must seek to allow fire to play its ecological role on the landscape to the maximum extent that proves socially acceptable. Whenever possible, causes of ecosystem degradation should be given attention equal to that of its symptoms.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 02:01 PM
H	When considering appropriate methods for active management less intrusive methods should be favored over more intrusive methods as a general rule. Given similar effectiveness at achieving an objective, wildland fire use should be favored over prescribed fire, and prescribed fire over thinning. Mechanical or hand thinning should be relegated to those areas in which structural modifications are necessary to accommodate natural fires, and/or areas where potential for unnaturally large crown fire fires (and catastrophic ecological shifts) exists.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:47 PM
J	The recommendations offered clearly and concisely address the myriad of issues that must be addressed to achieve meaningful and sustainable restoration objectives. If the Plan generally lays out what must be done, then it will be to the proposed Implementation Teams to address how such work will be accomplished. TWS looks forward to offering our expertise and playing an active role with these Teams. In the meantime, we hope that the following suggestions will help to further frame the issues the Implementation Teams will address.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:50 PM
J02	The Plan rightly acknowledges that the recommendations outline an ambitious program of work that will be planned and implemented over the course of decades. Over such a timeframe, social and political priorities shift and resources wax and wane. In keeping with the forward-thinking genesis of this initiative the Committee and State should devote appropriate time and energy to developing strategies that ensure the continuity of the vision and subsequent effort proceed as unaffected as possible.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:49 PM
J04	While we appreciate that the recommendations offered are interdependent and will be implemented concurrently and iteratively, the basis for much of the work of the Plan and the Implementation Teams will be dependant upon an assessment of past, present, and future statewide ecological conditions. Indeed, much of the actions called		

	for to immediately strengthen local restoration efforts would be better informed and therefore more strategic with the completion of such an assessment. To the extent practical, such an assessment should be given priority for the State's time and resources.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:51 PM
K04	Recommendations to reform incentives and performance measures are insightful and well formed. As noted in the Plan, incentives and performance measures should seek to address not simply the quantity of work being accomplished but the quality of that work as well. Concrete and specific motivation to accomplish quality work, through the development of incentives and performance measures will prove to be an invaluable task.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 02:00 PM
L02	In light of these issues, it's important that a statewide ecological assessment articulate a conceptual approach (or multiple possible approaches) to ecological restoration. The assessment should also articulate how each of these approaches translates into restoration (or management) goals and objectives for each ecosystem type. Systematic and rational pursuit of this goal requires a landscape assessment to identify and prioritize management needs and appropriate methods for restoring natural fire regimes.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:50 PM
L04	While we appreciate that the recommendations offered are interdependent and will be implemented concurrently and iteratively, the basis for much of the work of the Plan and the Implementation Teams will be dependant upon an assessment of past, present, and future statewide ecological conditions. Indeed, much of the actions called for to immediately strengthen local restoration efforts would be better informed and therefore more strategic with the completion of such an assessment. To the extent practical, such an assessment should be given priority for the State's time and resources.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:52 PM
L16	Throughout the Plan we find discussion of impediments and barriers to restoration work. There is no doubt that in many cases mitigating administrative barriers is a prudent course of action. However, we believe that it is important to recognize that perceived barriers, in many cases, act as checks and balances to ill-conceived programs of work.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:52 PM
L16	Efforts to address these barriers must be careful to fully weigh the costs and benefits of rapid action versus informed action, always with an eye to ensuing that the integrity of the best available science is maintained		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:55 PM
M11	Through this planning effort, the State has a unique opportunity to systematically move from uncharacteristically fire-prone wildlands, communities, and developed areas toward fire safe communities and developed areas within a matrix of forest ecosystems evolving through natural processes minimally influenced by human actions.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 02:01 PM

M11	When considering appropriate methods for active management less intrusive methods should be favored over more intrusive methods as a general rule. Given similar effectiveness at achieving an objective, wildland fire use should be favored over prescribed fire, and prescribed fire over thinning. Mechanical or hand thinning should be relegated to those areas in which structural modifications are necessary to accommodate natural fires, and/or areas where potential for unnaturally large crown fire fires (and catastrophic ecological shifts) exists.		
Tom Fry	tom_fry@tw.s.org	Wilderness Society	11/04/2004 at 02:00 PM
M11	In light of these issues, it's important that a statewide ecological assessment articulate a conceptual approach (or multiple possible approaches) to ecological restoration. The assessment should also articulate how each of these approaches translates into restoration (or management) goals and objectives for each ecosystem type. Systematic and rational pursuit of this goal requires a landscape assessment to identify and prioritize management needs and appropriate methods for restoring natural fire regimes.		
Tom Fry	tom_fry@tw.s.org	Wilderness Society	11/04/2004 at 02:00 PM
M11	This includes: (1) the appropriate spatial and temporal scale of reference conditions; (2) which ecosystem attributes should be referenced; (3) the degree of precision with which treatments and projects should emulate reference conditions; (4) the rate at which restorative changes should be implemented and (5) the value and practicality of attempting to emulate reference conditions in the face of new ecosystem stressors including noxious weeds, changed (and imperiled) wildlife populations, changed atmospheric chemistry, climate, and fragmentation of forests.		
Tom Fry	tom_fry@tw.s.org	Wilderness Society	11/04/2004 at 01:58 PM
M11	As duly noted in the Plan, ecological restoration seeks to enhance the resilience and sustainability of ecosystems through treatments that incrementally shift the ecosystem toward an historic range of conditions, or "natural variability." This program of work underpins scientific debate about how best to restore natural conditions to fire-adapted ecosystems.		
Tom Fry	tom_fry@tw.s.org	Wilderness Society	11/04/2004 at 01:57 PM
M11	A significant percentage of lands in the state of New Mexico are of special designations that often carry restrictive management prescriptions, for instance: Areas of Critical Environmental Concern, Citizen-proposed wilderness areas, Wilderness Study Areas, Designated Wilderness, National Monuments, and National Conservation Areas. Adjacent landowners may or may not recognize those designations. The State needs to work diligently in collaboration with cross-jurisdictional partners while also strictly adhering to the mandates and management stipulations of these landscapes.		
Tom Fry	tom_fry@tw.s.org	Wilderness Society	11/04/2004 at 01:57 PM
M11	Fire management and planning must necessarily transcend these ecologically arbitrary lines on a map. An integrated and cross boundary approach to fire management is essential in realizing the stated goals of this planning initiative. In as many instances as possible, the management prescriptions of adjacent and cross boundary fire management zones should complement each other to facilitate both management and ecological		

	consistency.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:57 PM
M11	Although fire does not respect jurisdictional boundaries, those boundaries are nonetheless very real considerations in this planning effort.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:56 PM
M11	Maps should also be provided to all Implementation Teams and stakeholders delineating administrative and public roads, trails, communities and developed areas requiring fire protection activities, as well as special elements (i.e.: Wilderness areas, Areas of Critical Environmental Concern, etc.) and cultural resource protection areas (when mapping of such values does not violate applicable law) requiring special fire management consideration.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:56 PM
M11	In order to move portions of a landscape from one condition into another, there is a foregone conclusion that the current state of the landscape is known, quantified, and accordingly mapped. In a prioritized assessment of ecological conditions, the landscape should be accurately portrayed with accompanying maps according to vegetation type, frequency, distribution, historical and current fire condition class.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:54 PM
M11	As such, short-term goals must serve as mileposts in achieving the larger aim. Such short-term outcomes may include: 1. Rigorous promotion of National Fire Plan fuel reduction efforts focused on areas where communities, their critical infrastructure, and ecosystem components are most at risk. 2. Wildland Fire Use is maximally applied as appropriate. 3. Federal, state, and non-governmental land managers are maximizing use of prescribed fire in places where Wildland Fire Use is not safe. 4. Thinning and other mechanical fuel reduction treatments are implemented where vegetation structure must be modified to accommodate natural fire.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 01:53 PM
M11	We encourage the State, Planning Committee, and Implementation Teams to frame restoration objectives, strategies, and actions, in part, according to the ultimate goals of fire management: 1) safe human communities, 2) wild, self-sustaining ecosystems in healthy condition, 3) managed ecosystems in healthy condition. The vision of a landscape composed of fire-safe communities in a healthy wildland ecosystem is a long-term but achievable goal. Where it is safe, fire should play its natural role, free of human control. Yet not all lands can be managed as such. Where natural fire is not safe, its beneficial role can be sustained through active management -- either through prescribed burning or by managing the ecosystem to be resilient to uncontrolled wildfire. Obviously, these goals must be achieved incrementally.		
Tom Fry	tom_fry@tws.org	Wilderness Society	11/04/2004 at 02:01 PM
	Across the West, restoration and landscape health have become increasingly pressing ecological, social, and economic issues. While restoration initiatives have been undertaken at the federal and local levels, too often		

N	state participation has been notably absent or has significantly lagged behind. This Plan provides the unique opportunity to fill that void in New Mexico. There will be many challenges and opportunities during this program of work. As active proponents of forward-thinking and solution-oriented public land restoration, we look forward to adding value to this initiative. Thank you for the opportunity to provide comment. We look forward to continuing discussions.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:57 PM
F03	Project Blackout began over five years ago as a representative stakeholder to include entire watersheds. I presented this to the State Water Plan/Interstate Stream Commission, and should be on record. The Acequias (72 in Taos) cleaning and converting coyote willow along banks to Artists charcoal, and then Tamarisk removal starting in Pilar down past the Middle District, and then the Beetle kill (dead and down NEPA approved), con't...		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:58 PM
F03	con't... besides the remains of the numerous forest fire remains as resources have adequately addressed concerns with BLM and Forest Service and Soil and Water. All Public meetings I've attended in the last 8 years, I can only hope has expanded the focus of the planning effort that already has been included. As Tennyson puts it. I am a part of all that I have met.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:58 PM
F03	I recommend all future staff leaders to read The Power of Full Engagement Managing Energy, Not Time, Is the Key to High Performance and Personal Renewal by Jim Loehr and Tony Schwartz (which included the Complete Corporate Athlete Training System) Free Press 2003. Good Job Everyone.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:56 PM
K11	con't... So the Forest Service is said to pay 44%? Most private foresters are barely breaking even! How about employing and insuring them under a program such as the CCC or YCC- such as the one I worked with in 1978-1979 on the ST. Croix River in Minnesota? My labor incentives as a C Corp also include my employees to own part of the business and start up funds coming from stock sold to everyone who uses electricity.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:55 PM
K11	Develop Labor Force recommendations-I contacted Dept of Labor this last year to discuss JTPA Jobs for Progress at the State Level from Taos to Walter Dunn.at the CFRP Forest Service. My requests to allocate Pork Funds at Legislative Levels in January 04 went unanswered. Also the fact that workman's Comp and all insurance has risen Apr 21 %a year since 911 Along with all unregulated medical business across the board is putting anyone who works with the state out of business.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:54 PM
L16	Mitigate Administrative Barriers do need to be updated in Time Wise; Expediency is necessary when you look at NEPA, EPA etc. Taking up to years' time and at the grantee expense as you know has stopped projects in their tracks. Look at the CFRP beginning track record! -After the grantee starts the project? (Giving a meaning to the		

	saying “throwing the baby out with the bathwater”) How about changing the status of Slow Emergency.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:53 PM
M	Propose that Project Blackout Inc. be a new State leadership entity responsible for implementing first steps of the Plan to work with the new state office integrating existing efforts into one unified effort for a Biomass Plant. One person with a belief is equal to a force of ninety-nine who only have a interest - says John Stuart Mill. I have many years of experience in specialized expertise in a wide variety of areas as well as being a broad stakeholder evolving in northern New Mexico.		
Amy Hoy	forester@state.nm.us	Project Blackout, Inc	11/01/2004 at 03:53 PM
M	Also Kit Carson Electric Co-op has specified a need to “Sell back to the Grid” and has encouraged me to partner up in supporting alternative energy. Contact Luis Reyes CEO @1-800 688-6780.		
Kimberly Paul	kpaul@state.nm.us	NMSF	10/21/2004 at 04:50 PM
K13	There is a clearinghouse for baseline GIS data for the state. Resource Geographic Information Services (RGIS) is housed at UNM and could be expanded to include other data related to this effort. The issue is that much of the data needed to conduct scientific spatial analysis of the entire state's vegetation does not exist consistently to make priorities in treatment areas. Baseline spatial data needs to be gathered and maintained as projects go forward.		
Kimberly Paul	kpaul@state.nm.us	NMSF	10/21/2004 at 04:55 PM
K14	High resolution spatial data is needed statewide. The most logical location to house this would be RGIS. There is a C3 (budget/legislative) proposal sponsored by the Office of the State Engineer being made to enhance RGIS into a Geospatial Recource Center, which will only assist in the efforts under this plan. Project tracking may be beyond the scope at the clearinghouse, but the data access and the other things mentioned here don't have maintained at the same location.		
Kimberly Paul	kpaul@state.nm.us	NMSF	10/21/2004 at 05:07 PM
L02	This assessment should be highly weighted by a spatial analysis (GIS). This will require the acquisition of high resolution imagery for the entire state. Differing levels of ecological condition and other factors will also need to be made prior to the analysis being started, in order to achieve meaningful results. The initial analysis would provide a baseline. The analysis would need to be a continuous process as projects are completed.		
Leland Pierce	LJSPierce@state.nm.us	New Mexico Dept. of Game and Fish	10/19/2004 at 10:04 AM
D06	I would suggest a plan for the future to include a Healthy Forest and Watershed initiative across administrations, up to and including a system of checks and balances. Given the potential political power of this overall plan, an administration not committed to the ecological health of our forests and watersheds could use this plan to instead rob the State of its resources, through excessive logging and land use.		
William H. See	swcd@carlsbadsoilandwater.org	Carlsbad Soil & Water Conservation District	10/12/2004 at 12:41 PM

N	The plan does not acknowledge or address the fact that approximately 60% of the lands in the watersheds are in private ownership. The plan needs to address methods of approaches to get participation from the private landowners in restoration and management of watershed areas. Federal lands make up a large part of our forests and watersheds, how are they going to be brought to the table in a coordinated effort to address all problems in a watershed?		
William H. See	swcd@carlsbadsoilandwater.org	Carlsbad Soil & Water Conservation District	10/12/2004 at 12:44 PM
N01	It appears the plan is calling for the establishment of a state agency with cabinet level leadership. If this is the case what entities would make up the new agency and how would their authority be re-aligned? The Carlsbad SWCD believes it would be better to assign an existing agency the task of coordinating watershed and forest health issues and projects among the entities that are working in the field of natural resource concerns.		
William H. See	swcd@carlsbadsoilandwater.org	Carlsbad Soil & Water Conservation District	10/12/2004 at 12:46 PM
N02	Creating a new agency will increase the competition for existing program funds and create divisions among entities that have worked hard to build strong working relationships. A new agency will require the expenditure of a large portion of funds on administration and overhead. We feel these funds would serve the people of New Mexico better being invested in on the ground projects.		
Hidalgo Soil & Water Conservation District	swcdhidalgo@yahoo.com	NMDA,USDA	10/21/2004 at 09:37 AM
K08	Hidalgo SWCD would encourage the use of all resources to beneficial use, during thinning operations and salvage operations after a natural or controlled burn.		
Hidalgo Soil & Water Conservation District	swcdhidalgo@yahoo.com	NMDA,USDA	10/21/2004 at 09:30 AM
K17	Hidalgo SWCD encourages the use of sound science in all decisions.		