

Valle Vidal Proposal Carson Forest Plan Revision



Photo credit: Jim O'Donnell

The Valle Vidal of New Mexico is a national treasure, beloved by sportsmen, ranchers, outfitters and guides, local businesses, concerned citizens, outdoor enthusiasts, and conservation groups. In accordance with the Valle Vidal's inherent beauty and value, the following is a list of shared values specific to the Valle Vidal that have been endorsed by thousands of Forest Stakeholders¹:

- The Valle Vidal's watersheds are of paramount value, and its waters are the lifeblood of the land's wildlife and our communities;
- The Valle Vidal is a vital resource to a sustainable future for northern New Mexico's rural and agricultural communities;
- The Valle Vidal provides unique recreational and sporting opportunities for families, hunters, anglers, boy scouts, and other outdoor enthusiasts;
- The Valle Vidal provides a home for abundant wildlife populations, and holds intrinsic ecological importance and scenic beauty;
- The Valle Vidal should be managed for the benefit of the people – all of the people.



Based on these shared values, we request that the Forest Service formally recognize the Valle Vidal in the Carson National Forest's Land and Resource Management Plan and establish management direction specific to the Valle Vidal that will ensure it remains protected over the life of the plan. To this end, we offer the following proposal to the Forest Service for consideration in the planning process and adoption in the final forest plan.

Area-Wide Plan Direction for the Valle Vidal

Desired Condition:

¹ These values were part of the Coalition for the Valle Vidal's Core Values statement that was signed and endorsed by numerous Counties, Villages, Towns and Cities and thousands of individuals and local businesses.



Management will maintain and restore the ecological integrity and resilience of terrestrial and aquatic ecosystems and watersheds in the Valle Vidal Area. Management will also maintain and restore the cultural and scenic environment and provide satisfying experiences that expand visitors' understanding of these resources and inspire a stewardship ethic. Management actions will foster resilience to account for resource stressors,

including climate change impacts, whether direct, indirect, or cumulative. The aquatic and watershed resources within the Valle Vidal are returned to functioning condition through restoration efforts. Forage for wildlife and livestock is increased through restoration of the rich wet meadow complexes that exist across the area. The natural biological diversity of the area is restored and maintained, including efforts to return Rio Grande Cutthroat Trout. The exceptional scenic resources for which the Valle Vidal is known will be retained and restored. Visitors to the area connect to cultural heritage and nature through sustainable recreation and the unique qualities of the area. Recreation opportunities are adapted to a culturally diverse population, making the benefits of outdoor recreation available to all. Opportunities for outdoor, nature-based education and inspiring land stewardship in young people are retained and encouraged. Opportunities for primitive and semi-primitive recreation are emphasized.

Objectives:

- Over the life of the plan, rivers and streams meet water quality standards and are returned back to functioning condition through restoration efforts.
- Protocols for monitoring Outstanding Natural Resource Waters (ONRW) are developed.
- ONRWs are not degraded and the essential character or special use that makes the water an ONRW is protected.
- All watersheds in the Valle Vidal are functioning properly.
- Hydrologic function of wetlands is restored, with an emphasis on Wetland Jewels.
- Forage for wildlife and livestock is increased.
- USFS National Best Management Practices for water quality are implemented for all roads and grazing.
- Biological diversity is restored and maintained, in particular, through opportunities to foster landscape scale wildlife habitat connectivity and permeability with surrounding federal, state, and private lands. Opportunities to reintroduce native species, including black footed-ferret will be assessed and, if feasible, acted upon.

- Habitat conditions necessary to support Rio Grande Cutthroat Trout, Rio Grande Chub, Rio Grande Sucker, Creek Chub and other native fish identified in the New Mexico Department of Game and Fish's (NMDGF) [Fisheries Management Plan](#) are restored and maintained.
- Infrastructure necessary to provide visitor access will be improved and maintained.
- Rules for recreating in the Valle Vidal are more visible for forest visitors, including signage and kiosks at parking lots, campground, and trailheads.
- Scenic integrity of the Valle Vidal landscape is retained. Unneeded improvements are removed in order to restore apparent naturalness.
- Opportunities for youth development of wilderness skills is retained and promoted.
- Forest Plan revision NEPA process provides framework for implementation-level restoration action through tiering, reducing agency costs, concentrating implementation-level NEPA analyses on issues specific to a particular restoration project, and speeding the time from the conception to implementation of restoration action.

Standards and Guidelines:

- Travel Management Plan Direction:
 - No net new construction of permanent roads.
 - No new construction of motorized trails.
 - All temporary roads are removed and the lands and waters on which they were located are restored to natural conditions within one year of the completion of the purpose for which they were established.
 - Summer and winter motorized cross-country travel for recreational purposes is not permitted. Recreational use of off-road and over-snow vehicles is limited to designated roads. Limited use of UTVs and ORVs for grazing purposes and implementing restoration projects is allowed on a permit basis.
 - Roads displayed on the Motor Vehicle Use Map (MVUM) will be maintained for passenger vehicle travel.
 - Unauthorized routes and system roads that are not needed for future use are decommissioned and recontoured to restore natural hydrologic conditions. The Carson will prioritize decommissioning those closed, unauthorized routes and unneeded roads that are posing a risk to water quality. The agency will utilize its categorical exclusion to expedite the removal of unneeded roads.
 - Prior to decommissioning system and temporary roads, the Forest Service will assess the necessity of the route to access possible future restoration and restoration maintenance needs.
- Range:
 - Manage consistent with desired conditions and watershed restoration objectives.
 - Manage range resources to maintain and improve forage conditions.
 - Manage range resources to maintain and improve watershed condition to a functioning condition class.

- Incorporate the needs of other resources when developing allotment management plans. Allotment management plans will facilitate improvement of watershed condition.
- In coordination with grazing permittees and New Mexico Department of Game and Fish, monitor condition of wetlands, evaluate whether management changes are necessary to ensure desired conditions are achieved, recommend and implement management changes and projects to achieve desired conditions.
- Recreation:
 - Vehicular camping shall occur only at developed campgrounds.
 - Vehicular parking shall occur only at designated parking areas.
 - Avoid development of facilities within riparian areas.
 - Backcountry camping shall occur at least a half mile from open roads.
 - Infrastructure will be limited to that which is necessary to provide for a primitive and semi-primitive recreation experience.
- Minerals:
 - In accordance with the Valle Vidal Protection Act of 2006, P.L. 109-385 (Dec. 12, 2006), Federally owned minerals are closed to leasing
 - Closed to renewable energy leases
 - Closed to material mineral sales
- Silviculture:
 - No commercial timber harvesting, unless as a byproduct of ecological restoration.
- ROWs:
 - Manage the area to avoid additional linear ROWs
- Additional Prescriptions:
 - Ground-disturbing military maneuvers are not allowed
- Minerals
 - Conformance with Public Law 109-385 (the Valle Vidal Protection Act)
- Visual Quality
 - Locate man-made structures, to the extent possible, where they will not be silhouetted against the sky.
 - Manage the visual resource to maintain the



natural appearing landscape.

- Fire Management
 - Continue and expand the use of prescribed fire, planned and unplanned ignition, in management of the area.
- Administration
 - Encourage use of small local contractors, to the extent possible, in carrying out National Forest programs.

Plan Direction for Special Areas within the Valle Vidal Geographic Area

We request that the Carson National Forest adopt the following plan direction for special areas within the Valle Vidal Geographic Area:

Comanche Creek Watershed

Acres: 27,262

The Comanche Creek Watershed holds very high native trout value and is recognized for its importance for the survival and recovery of the Rio Grande Cutthroat Trout. To date, partners and USFS have put a tremendous amount of work into restoring the Comanche Creek Watershed. In fact, the USFS has identified the Comanche Creek Watershed as a priority watershed under the Watershed Condition Framework (WCF) initiative.²

Plan Direction: We request that the USFS establish plan direction for the Comanche Creek Watershed that recognizes the ongoing restoration work that has occurred and ensures this restoration work continues to be prioritized.

- **Desired Condition:** The Watershed is restored to a functioning condition under the WCF. Compliance with the Clean Water Act water quality standards is achieved. Habitat conditions necessary to ensure a stable population of Rio Grande Cutthroat Trout and other native fish identified in the NMDGF's Fisheries Management Plan are restored.
- Identify the Comanche Creek Watershed as a priority watershed in the forest plan per the planning rule (36 CFR § 219.7 (f)(i)).³
- **Objective:** Forest develops and implements a Watershed Restoration Action Plan (WRAP) for the Comanche Creek Watershed within 8 years of development of a forest plan. The WRAP will

² U.S. Forest Service Watershed Condition and Prioritization Interactive Online Map. Available online at: <http://apps.fs.usda.gov/nfs/nrm/wcatt/WCFMapviewer/>. Last viewed April 5, 2016.

³ Recognizing the Comanche Creek Watershed as a priority watershed will also better integrate the USFS's Watershed Condition Framework.

identify priority restoration actions and a list of essential projects to restore the watershed. Implementation of the WRAP includes completing both the requisite NEPA analysis as well as the list of essential restoration projects.

McCrystal Creek and Vidal Wetland Jewels

McCrystal Creek: 17,107 acres

Vidal: 9,795 acres

Wetlands are a small but important ecosystem type. “As the transition between terrestrial and aquatic systems, wetlands provide increased biodiversity where they occur. They improve water quality and quantity by slowing both channel and overland peak flows allowing for greater absorption, by processing and storing peak flows, by supporting surface flows with released groundwater, and by retaining and transforming excess nutrients and sediments, including many heavy metals. They are relatively productive sites and many sequester carbon (MES 2005; Kusler 2004).”⁴ The Assessment notes that wetlands are at risk on the forest due to their distribution alone, and wetland condition at the plan and context scales is departed.⁵

There are two wetland complexes in the Valle Vidal: McCrystal Creek and Vidal Wetland Jewels, that have been identified as part of a Carson forest wide wetland assessment. The McCrystal Creek Wetland Jewel is nearly identical to the boundary for the Headwaters North Ponil Creek Watershed,⁶ and the Vidal Wetland Jewel falls entirely within the upper Comanche Creek Watershed.⁷

Plan Direction: We request that the USFS establish plan direction for the McCrystal Creek and Vidal Wetland Jewels that ensures these wetland complexes are protected and prioritized for restoration work. We request that the USFS initiate a process that identifies threats to the two Wetland Jewels and provides protections that preserve and enhance the identified priority Carson Wetland Jewel functions as explained in the scoping letter submitted by Amigos Bravos on November 20, 2015.⁸ Plan direction for the Wetland Jewels includes the following:

- **Desired Condition:** The identified ten priority Carson Wetland Jewel functions are restored. Headwaters-North Ponil Creek and Comanche Creek Watersheds are restored to a functioning condition under the WCF. Compliance with the Clean Water Act water quality standards is achieved.
- **Objective:** Forest develops and implements a WRAP for the:

⁴ Carson Forest Assessment Report, p. 152.

⁵ *Ibid*, 153.

⁶ The 12th HUC Code for the Headwaters North Ponil Creek Watershed is 110800020203.

⁷ The 12th HUC Code for the Comanche Creek Watershed is 130201010102.

⁸ The scoping letter submitted by Amigos Bravos and Western Environmental Law Center dated November 20, 2015 outlines nine priority wetland functions. Since that letter was submitted, Amigos Bravos has added a tenth wetland function. You can find an explanation for all ten functions online here:

<http://smumn.maps.arcgis.com/apps/MapSeries/index.html?appid=c26c3b06242e4e3bac4e4c04f3839b27>.

- Vidal Wetland Jewel / Comanche Creek Watershed within 8 years of development of the forest plan.
- McCrystal Creek Wetland Jewel / Headwaters North Ponil Creek Watershed within 10 years of development of the forest plan.
- Standard: Avoid and mitigate the impacts of activities that stress the Wetland Jewels and their ten functions.
- Standards and Guidelines: The Valle Vidal area-wide prescriptions apply.
- Identify the Headwaters-North Ponil Creek and Comanche Creek Watersheds as priority watersheds in the forest plan per the planning rule at 36 CFR § 219.7 (f)(i).
- Establish a forest-wide Wetland Jewels Management Area that would include all ten wetland jewels identified by Amigos Bravos across the Carson National Forest, including the two jewels in the Valle Vidal Geographic Area. Establishing the Wetland Jewel Management Area will ensure that the unique aquatic resources these areas possess are protected and restored.

Upper Ponil Botanical Area

Acres: 4,083⁹

This special area designation includes an old growth stand of Rocky Mountain bristle cone pine near Clayton Corral, the high elevation grasslands near Little Costilla Peak and Ash Mountain, and the wetlands near Elk Meadows. The Bristlecone Pine stand is one of the largest contiguous stands in the United States. It also contains one of the largest known bristlecone pine trees of this species in the world.

Plan direction: Plan direction for the Upper Ponil Botanical Area is that which is necessary to protect the bristlecone pine botanical resource. The Valle Vidal area-wide prescriptions apply. Additional plan direction may be necessary, including plan direction for grazing and dispersed camping, including group size limits and limiting camping to designated sites, as well as trail maintenance and signage. The area boundary is consistent with the original proposed plan amendment that was published in the Federal Register on June 14, 2005.

Eligible Wild and Scenic Rivers

The U.S. Fish and Wildlife Service estimates that 70% of riparian habitat nationwide has been lost or altered due to human development.¹⁰ Dams and other artificial barriers alter the quantity and timing of a river's flow, which can block fish migrations, destroy fish habitat, introduce non-native species, degrade nutrient cycles, disrupt food webs, and cause fish to cross-breed when competing for limited

⁹ This acreage is based on the Proposed Carson National Forest Plan Amendment for the Valle Vidal. p. 6. Available online at: http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev7_011098.pdf.

¹⁰ National Wild & Scenic Rivers System, River and Water Facts, <http://www.rivers.gov/waterfacts.php> (last visited July 10, 2015).

spawning sites.¹¹ Over 75,000 large dams have modified about 17% of American rivers.¹² Designated WSRs are managed to maintain their free-flowing nature and outstandingly remarkable resource value. The Carson has only two river sections designated WSR, and both are managed by the BLM.

The Carson does currently have sixty-seven eligible WSRs identified in previous inventory efforts. Several of these rivers are in the Valle Vidal: McCrystal Creek, Middle and North Ponil Creeks, and the entire Rio Costilla drainage, including Comanche Creek and its tributaries.¹³

Plan direction: All WSRs found eligible in the existing forest plan, including those in the Valle Vidal, will be retained in the revised plan.

- Desired Condition: Eligible and designated WSRs remain free-flowing, with high-quality and adequate water supply to maintain their outstandingly remarkable values in the face of climate change and other stressors.
- Standards:
 - Reflect, reference, and/or repeat the interim protection measures described USFS's 2015 planning directives.¹⁴
 - Account for existing and reasonably foreseeable climate-change impacts to water quality and quantity in assessing effects of projects and activities on eligible and designated WSRs.

¹¹ American Fisheries Society (n.d.). Policy Statement #9: Effects of Altered Stream Flows on Fishery Resources. Available at http://fisheries.org/docs/policy_statements/policy_9f.pdf.

¹² About The WSR Act, <http://www.rivers.gov/wsr-act.php>.

¹³ New Mexico Department of Game and Fish, New Mexico Environment Department - Surface Water Quality Bureau, and New Mexico Energy Minerals and Natural Resources Department - State Forestry. Nomination of the Waters of the Valle Vidal as Outstanding National Resource Water. Table 1, p. 7. <http://www.wildlife.state.nm.us/download/conservation/habitat-handbook/Valle-Vidal-Protection-Petition.pdf>.

¹⁴ FSH 1909.12, Ch. 80, § 84.3.

Proposed Valle Vidal Geographic Area

